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Status Report: Administrative Appeals Relating to Treasury Policy Decision on Large Capacity Military Magazine Rifle Importation - May 21, 1998 [1]

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**Status Report: Administrative Appeals Relating to
Treasury Policy Decision on Large Capacity Military Magazine Rifle Importation
May 21, 1998**

Letters sent by ATF to importers on April 8, 1998 advised them that no final determinations would be made on individual permits until 30 days after the importer's receipt of the letter, during which time importers could challenge the determination as to their firearms. This notice was sent not only to importers whose permits were granted, then suspended in November, and revoked in April, but also to importers that had applied for but not been granted permits in November 1997.

Twelve of the 27 importers affected by the suspension and subsequent revocation of permits have submitted administrative appeals. The appeals relate to 56 of the 73 revoked permits, and cover 558,535 of the 656,280 complete firearms covered by those permits. ATF also applied the Treasury policy determination to certain firearms parts, specifically, firearms receivers that have a port to which large capacity military magazine can be attached. Such receivers may now only be imported under a restricted permit authorizing assembly of the receiver into a sporting firearm. The appeals also cover 304,800 of the 322,802 receivers covered by revoked permits. None of the 46 importers whose applications were pending in November filed appeals.

AD(FEA)



CENTURY ARMS, INC.

48 Lower Newton Street
St. Albans, Vermont 05478
Tel: (802) 524-5268 Fax: (802) 524-5631

May 5, 1998.

Via Federal Express

RECEIVED
MAY 6 12 51 PM '98
DIRECTOR, BUREAU OF
ALCOHOL, TOBACCO &
FIREARMS

Mr. John W. Magaw
Director
Bureau of Alcohol, Tobacco and Firearms
U.S. Department of the Treasury
650 Massachusetts Avenue, N.W., Room #8000
Washington, DC 20226

Dear Mr. Magaw:

Re: The revocation of permit numbers:	97-10234	96-10236	97-09608
	97-05558	96-10759	
	97-09510	97-09509	
	97-09511	97-10763	

We are in receipt of your letter dated April 10th sent by certified mail, Century Arms Inc hereby appeals the decision to deny or revoke the above listed import permits as the rifles in question do meet the sporting criteria set out in the Gun Control Act of 1968, 18 U.S.C. § 925(d). We believe that the Department of the Treasury Study on the Sporting Suitability of Modified Semiautomatic Assault Rifles (April 1998) is based on legal errors and factual inaccuracies.

We hereby incorporate by reference all records and evidence of every kind whatever known to the Department of the Treasury when it determined that the subject rifles or types of rifles did meet the sporting test, as well as when it determined that they did not meet the test. These records and evidence thereby include that which was before Treasury in 1968 when it first determined that such rifle types met the sporting test, when it first determined during or after your 1989 study that the specific subject rifles and types of rifles met the sporting test, and all other records and evidence available to the Department through the present. These records and evidence include not only submissions by this firm but also submissions by all interested persons and entities whatever for the entire period of 1968 to the present.

18 U.S.C. § 925 (d) provides in part:

The Secretary shall authorize a firearm ... to be imported or brought into the United States ... if the firearm ... (3) is of a type that does not fall within the definition of a firearm as defined in section 5845(a) of the Internal Revenue Code of 1954 and is generally recognized as particularly suitable for or readily adaptable to sporting purposes, excluding surplus military firearms ...

The rifles in question here meet both tests in that they are generally recognized as particularly suitable for and readily adaptable to sporting purposes. The rifles are not military rifles, are not used by any military force, and would not even be considered for use by any military force. The rifles have no use other than for sporting purposes, particularly target shooting (competitive and practice) and hunting.

The ability to accept a large capacity military magazine is also the ability to accept a small capacity non-military magazine. A rifle with this feature is obviously readily adaptable to sporting purposes even as narrowly defined in the Study. Further, Congress clarified the matter in the Public Safety and Recreational Firearms Use Protection Act of 1994. Among the "recreational firearms" excluded from the assault weapon category are the Iver Johnson M-1 Carbine and the Iver Johnson 50th Anniversary M-1 Carbine, 18 U.S.C. 922 (v)(3) and Appendix A. It is noteworthy that all of the rifles at issue which fire 7.62 NATO, 7.62x39 and 5.56mm cartridges are more accurate and fire at greater ranges than the M-1 carbine.

Relative to pre-1989 variants of the rifles, rifles suspended from importation have been modified by the substitution of thumbhole-type stocks for the conventional fixed or folding stocks and pistol grips. Flash suppressors (previously on some AK-47/AKM and Galil-variant rifles), muzzles threaded to accept flash suppressors, bayonet mounts, flash suppressors that serve as grenade launchers (previously on Galil variants) bipods (previously on some Galil variants) and night sights (previously on Galil variants) have been removed or are omitted. As with previous variants of the rifles, those suspended from importation employ a semi-automatic receiver and fire control mechanism.

The AK-47/AKM-variant rifles are, like most centerfire semi-automatic rifles, gas-operated. By a large margin, most are designed to use 7.62x39mm caliber ammunition. One Galil variant rifle is designed to use .308 Win. caliber ammunition, while others and some AK-47/AKM-variant rifles are designed to use .223 Rem. caliber ammunition. Some models use 5.45x39mm ammunition.

The AK-47/AKM/Galil-variant rifles are identical in function and caliber to semi-automatic rifles protected as sporting rifles in the Recreational Firearms law, including the Ruger Mini-14 and Mini-Thirty rifles (protected by name) and Armalite, Bushmaster, Colt, Olympic Arms and other rifles (protected by description). Like all these rifles, the AK-47/AKM/Galil-variant rifles do not possess two or more of the features or characteristics proscribed by Congress in the Recreational Firearms law or that ATF in 1989 began to prohibit with respect to imported rifles.

For the reasons noted previously, AK-47/AKM/Galil-variant rifles are particularly suitable for hunting and target shooting. Additionally, in densely forested or brushy areas, the rifle's relatively compact profile and light weight contribute to a hunter's ability to carry it without undue fatigue and to move silently (longer rifles are more likely to become caught in brush, vines, etc.).

The AK-47/AKM/Galil-variant rifles are permitted under the rules governing NRA High Power Bullseye (Match Rifle Category), High Power Sporting Rifle and High Power Silhouette (7.62x39 and .308 Win. only). The .308 caliber variant rifles are particularly suitable for all three disciplines. Due to factors relating to ballistics and the scoring system used in the competition, 7.62x39 caliber variant rifles are particularly suitable for the latter two disciplines, while .223 caliber variant rifles are particularly suitable for High Power Sporting Rifle. The .223s and the 5.45x39mm are readily adaptable to NRA High Power Bullseye (Match Rifle Category). All the rifles are suitable for various other competitive disciplines and non-competitive target shooting.

The relatively light recoil of 7.62x39, 5.45x39mm, and .223 caliber models is of importance to some hunters and target shooters.

FAL Variants

Relative to pre-1989 variants of the rifles, the rifles suspended from importation have been modified by the substitution of thumbhole-type stocks for the conventional fixed or folding stocks and pistol grips. Flash suppressors, muzzles threaded to accept flash suppressors, bayonet mounts, flash suppressors that serve as grenade launchers, bipods (not standard previously) and night sights (not standard previously) have been removed or are omitted. As with previous models of the rifles, those suspended from importation employ a semi-automatic receiver and fire control mechanism.

Semi-automatic FAL-variant rifles, like most centerfire semi-automatic rifles, are gas-operated. Most are designed to use .308 Win. caliber ammunition.

The FAL-variant rifles are identical in function and caliber to .308 caliber semi-automatic rifles protected as sporting rifles in the Recreational Firearms law, including the Browning and Remington rifles (protected by name) and the Springfield M1A (protected by description). Like the Browning, Remington and Springfield rifles, the FAL-variant rifles do not possess any of the features or characteristics proscribed by Congress in the Recreational Firearms law or that ATF in 1989 began to prohibit with respect to imported rifles.

FAL-variant, Browning, Remington and Springfield rifles typically measure 40"-44" in length, overall, with barrels of 21"-22." FAL-variant rifles and Springfields weigh approximately nine pounds, while the Remingtons and Brownings weigh approximately eight pounds.

For the reasons noted previously, FAL-variant rifles are particularly suitable for hunting and target shooting. Additionally, among NRA competitive marksmanship disciplines, semi-automatic FAL-variant rifles are permitted under the rules governing High Power Bullseye (Match Rifle Category), High Power Sporting Rifle and in High Power Silhouette and are particularly suitable for each. The rifles are suitable for various other competitive disciplines and non-competitive target shooting. In addition to high-quality standard-grade FALs, customized match-grade FALs have been on the market for some time. Match-grade components, such as sights, triggers, barrels, etc., have also been available for some time to consumers who wish to improve the performance of standard-grade FAL-variant rifles.

HK91 Variants

Relative to pre-1989 variants of the rifles, the rifles suspended from importation have been modified by the substitution of thumbhole-type stocks for the conventional fixed or folding stocks and pistol grips. Flash suppressors, muzzles threaded to accept flash suppressors, bayonet mounts, flash suppressors that serve as grenade launchers, bipods and night sights (not standard previously) have been removed or are omitted. As with previous models of the rifles, those suspended from importation employ a semi-automatic receiver and fire control mechanism.

HK91-variant rifles are delayed roller blowback system semi-automatics chambered to use .308 Winchester caliber ammunition.

HK91-variant rifles are identical in function and caliber to .308 caliber semi-automatic rifles protected as sporting rifles in the Recreational Firearms law, including the Browning and Remington rifles (protected by name) and the Springfield M1A (protected by description). Like the Browning, Remington and Springfield rifles, the HK91-variant rifles do not possess any of the features or characteristics proscribed by Congress in the Recreational Firearms

Mr. John W. Magaw
May 5, 1998.
Page 5

law or that ATF in 1989 began to prohibit with respect to imported rifles.

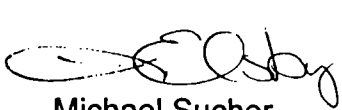
The HK91-variant, Browning, Remington and Springfield rifles are of a comparable overall and barrel length. Specifically, HK91-variant rifles typically measure 40" overall with barrels of 18" and weigh 9-10 pounds. The lengths and weight of the other rifles has been noted previously.

For the reasons noted previously, HK91-variant rifles are particularly suitable for hunting and target shooting. Additionally, HK91-variant rifles are permitted under the rules governing NRA High Power Bullseye (Match Rifle Category), High Power Sporting Rifle and High Power Silhouette and are particularly suitable for each. In addition to high-quality standard-grade HK91-variant rifles, match-grade HK91-variant rifles have been on the market for some time. Match-grade components have also been available for some time, to consumers who wish to improve the performance of standard-grade HK91-variant rifles. The PSG-1 trigger group, which can be used in HK91-variant rifles, is widely recognized as a first-rate unit.

We have also enclosed permit#97-07407 which we have not yet received a revocation letter on, however, according to the Secretary's determination these are banned.

Based on the above, Century Arms respectfully requests that you reverse your initial determination regarding these permits and approve Century Arms' import permits for the rifles in question. Please contact us if you need any further information.

Sincerely,


Michael Sucher
Chairman

MS/le
Encl.

Note: Copies of all permits referenced are enclosed with the exception of 97-09608. We believe this is a typing error in your letter of December 17th as the permit number is 97-09508 which we have enclosed.

THE WHITE HOUSE
WASHINGTON

November 14, 1997

MEMORANDUM FOR THE SECRETARY OF THE TREASURY

SUBJECT: Importation of Modified Semiautomatic
Assault-Type Rifles

The Gun Control Act of 1968 restricts the importation of firearms unless they are determined to be particularly suitable for or readily adaptable to sporting purposes. In 1989, the Department of the Treasury (the Department) conducted a review of existing criteria for applying the statutory test based on changing patterns of gun use. As a result of that review, 43 assault-type rifles were specifically banned from importation. However, manufacturers have modified many of those weapons banned in 1989 to remove certain military features without changing their essential operational mechanism. Examples of such weapons are the Galil and the Uzi.

In recent weeks Members of Congress have strongly urged that it is again necessary to review the manner in which the Department is applying the sporting purposes test, in order to ensure that the agency's practice is consistent with the statute and current patterns of gun use. A letter signed by 30 Senators strongly urged that modified assault-type weapons are not properly importable under the statute and that I should use my authority to suspend temporarily their importation while the Department conducts an intensive, expedited review. A recent letter from Senator Dianne Feinstein emphasized again that weapons of this type are designed not for sporting purposes but for the commission of crime. In addition, 34 Members of the House of Representatives signed a letter to Israeli Prime Minister Binyamin Netanyahu requesting that he intervene to stop all sales of Galils and Uzis into the United States. These concerns have caused the Government of Israel to announce a temporary moratorium on the exportation of Galils and Uzis so that the United States can review the importability of these weapons under the Gun Control Act.

2

The number of weapons at issue underscores the potential threat to the public health and safety that necessitates immediate action. Firearms importers have obtained permits to import nearly 600,000 modified assault-type rifles. In addition, there are pending before the Department applications to import more than 1 million additional such weapons. The number of rifles covered by outstanding permits is comparable to that which existed in 1989 when the Bush Administration temporarily suspended import permits for assault-type rifles. The number of weapons for which permits for importation are being sought through pending applications is approximately 10 times greater than in 1989. The number of such firearms for which import applications have been filed has skyrocketed from 10,000 on October 9, 1997, to more than 1 million today.

My Administration is committed to enforcing the statutory restrictions on importation of firearms that do not meet the sporting purposes test. It is necessary that we ensure that the statute is being correctly applied and that the current use of these modified weapons is consistent with the statute's criteria for importability. This review should be conducted at once on an expedited basis. The review is directed to weapons such as the Uzi and Galil that failed to meet the sporting purposes test in 1989, but were later found importable when certain military features were removed. The results of this review should be applied to all pending and future applications.

The existence of outstanding permits for nearly 600,000 modified assault-type rifles threatens to defeat the purpose of the expedited review unless, as in 1989, the Department temporarily suspends such permits. Importers typically obtain authorization to import firearms in far greater numbers than are actually imported into the United States. However, gun importers could effectively negate the impact of any Department determination by simply importing weapons to the maximum amount allowed by their permits. The public health and safety require that the only firearms allowed into the United States are those that meet the criteria of the statute.

Accordingly, as we discussed, you will:

- 1) Conduct an immediate expedited review not to exceed 120 days in length to determine whether modified semiautomatic assault-type rifles are properly importable under the statutory sporting purposes test. The results of this review will govern action on pending and future applications for import permits, which shall not be acted upon until the completion of this review.

3

2) Suspend outstanding permits for importation of modified semiautomatic assault-type rifles for the duration of the 120-day review period. The temporary suspension does not constitute a permanent revocation of any license. Permits will be revoked only if and to the extent that you determine that a particular weapon does not satisfy the statutory test for importation, and only after an affected importer has an opportunity to make its case to the Department.

William J. Christie



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

NOV 17 1997

VIA OVERNIGHT MAIL

Century Arms, Inc.
48 Lower Newton Street
St. Albans, VT 05478

Gentlemen:

The purpose of this letter is to inform you of recent actions relating to the importation of certain semiautomatic rifles into the United States.

Under 18 U.S.C. § 925(d)(3), firearms may only be imported into the United States if it is determined that they are of a type generally recognized as particularly suitable for or readily adaptable to sporting purposes. On November 14, 1997, the President and the Secretary determined to conduct a review as to whether modified semiautomatic assault-type rifles are properly importable under the sporting purposes test. In consideration of the public health and safety, including the numbers of firearms approved for importation and pending import applications, it was determined that approved permits for these rifles should be suspended while this review is being conducted. It was also determined that pending and future applications to import these weapons should not be acted upon until the completion of the review. Attached is a copy of the President's memorandum to the Secretary.

Accordingly, your permits to import the following models of firearms on the permit numbers indicated were suspended on November 14, 1997:

<u>Firearms Model</u>	<u>Permit Number</u>
MLSR	97-10234
AK (WUM-1)	97-05558
WUM-1	97-09510
MISR	97-09511

We intend to complete the review within 120 days.

The U.S. Customs Service has been directed not to release any of the questioned rifles for entry into the commerce of the United States. However, pursuant to 18 U.S.C. § 925(a)(1), the rifles

- 2 -

Century Arms, Inc.

may be imported for sale to governmental entities, including law enforcement agencies, upon submission of a new permit application accompanied by purchase orders and ATF's issuance of new permits. In addition, upon execution of a Customs bond, you may be authorized by the Customs Service to remove these weapons for storage at your premises or other suitable premises pending the review. If Customs permits such removal, the weapons would remain under Customs custody and could not be distributed in the commerce of the United States.

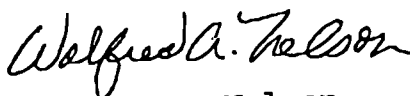
Any of the weapons in Customs' custody may also be exported with the appropriate export license. ATF will assist you in dealing with the Department of State regarding the required export license. Further, as you know, firearms subject to the suspension which have not yet entered the United States may be sold in markets outside the United States.

During the 120-day review period, ATF will study the modified semiautomatic assault-type rifles to determine whether they are importable under the sporting purposes test and will not make a final decision until the review is concluded. You may, within 30 days of receipt of this letter, submit any information or materials that you believe would assist ATF in conducting the review. Any materials submitted by you will be carefully considered in the study.

This suspension is not a permanent revocation of the import permits listed above. Before any decision is made to revoke your permits, you will be given specific notice and an opportunity to respond.

Should you have any questions concerning this action or your opportunity for input into the decision, please contact the Firearms and Explosives Imports Branch at (202)927-8320.

Sincerely yours,



Walfred A. Nelson
Chief, Firearms, Explosives, and
Arson Services Division

Attachment

1/22/97 Kirsten, Queta, Lyn 2pgs.

Form Approved: OMB No. 1512-0017

DEPARTMENT OF THE TREASURY - BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
**APPLICATION AND PERMIT FOR IMPORTATION OF FIREARMS,
 AMMUNITION AND IMPLEMENTS OF WAR**
 NOT FOR USE BY MEMBERS OF THE UNITED STATES ARMED FORCES
 (Submit in triplicate)

FOR ATF USE ONLY

PERMIT NO.
96-10234VALID FOR 12 MONTHS AFTER THE
DATE OF APPROVAL (ITEM 17 BELOW)

SECTION I - APPLICATION

1. FEDERAL FIREARMS LICENSE (If Any)		2. TELEPHONE NO.	3. COUNTRY OF EXPORTATION
LICENSE NO. 6-03-006-11-9E-33164	EXPIRATION DATE 5-1-99	802-527-1252	Egypt
4. RETURN APPROVED PERMIT TO (Enter name, address and ZIP Code if different than applicant's) Century Arms, Inc. 48 Lower Newton Street St. Albans, VT 05478		5. APPLICANT'S NAME AND ADDRESS (Including ZIP Code) Same as item 4	
6. NAME AND ADDRESS OF FOREIGN SELLER Maadi Cairo, Egypt		7. NAME AND ADDRESS OF FOREIGN SHIPPER Same as item 6	

8. DESCRIPTION OF FIREARMS AND AMMUNITION (For firearms, enter (SG) - Shotgun; (R) - Rifle; (PI) - Pistol; (RE) - Revolver)

8. DESCRIPTION OF FIREARMS AND AMMUNITION											
NAME AND ADDRESS OF MANUFACTURER a		TYPE (SG, R, PI, RE) b	GAUGE OR SIZE c	MODEL (MFRS.) DESIGN d	LENGTH OF BARREL e	OVERALL LENGTH (Inches) f	SERIAL NO. g	NEW (N) OR USED (U) h	QUANTITY (Each type) i	UNIT COST j	
FIREARMS	Maadi, Egypt	RI	.223	MISR	16"	36"		N	18,000	\$110	
	" "	RI	7.62	MISR	16"	36"		N	18,000	\$110	
	" "	PI	x39	Helwan	4.5"	8.5"		N	24,000	\$60	
	" "	PI	9mm	920	4.5"	8.5"		N	500	\$140	
AMMUNITION	City and State of the importer. (See Art I thru XII (Except firearms & ammunition) of U.S. Munitions Import List, 27 CFR Part 47) 10-rd magazine for MISR 8-rd magazine for Helwan 10-rd magazine for 920 PLINAGE BEN REYNE FOR INFORMATION 72,000 N/C 72,000 N/C 1500 N/C										
IMPLEMENTS OF WAR	Maadi, Egypt										
	" "										
	" "										

9. SPECIFIC PURPOSE OF IMPORTATION (Use additional sheets, if necessary)

For resale to FFL dealers.

10. ARE YOU REGISTERED PURSUANT TO THE ARMS EXPORT CONTROL ACT OF 1976 ☒ YES ☐ NO	11. IF "YES", GIVE REGISTRATION NO. A-16-237-1024
--	--

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of knowledge and belief, it is true, correct, and complete.

12. SIGNATURE OF APPLICANT <i>Scott Corrigan</i>	13. TITLE Scott Corrigan - Manager	14. DATE 11-12-96
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SECTION II - FOR ATF USE ONLY (Please make no entries in this section)

15. THE APPLICATION HAS BEEN EXAMINED AND THE IMPORTATION OF THE FIREARMS, AMMUNITION, AND IMPLEMENTS OF WAR DESCRIBED HEREIN IS:

- ☐ APPROVED
- ☐ PARTIALLY APPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER
- ☐ DISAPPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER

SIGNATURE OF THE DIRECTOR, BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

17 JAN 3 1997

Form Approved: OMD No. 1512-0017

FOR ATF USE ONLY

PERMIT NO.

57-5558

VALID FOR 12 MONTHS AFTER THE
DATE OF APPROVAL (ITEM 17
BELOW)

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
**APPLICATION AND PERMIT FOR IMPORTATION OF FIREARMS,
AMMUNITION AND IMPLEMENTS OF WAR**

NOT FOR USE BY MEMBERS OF THE UNITED STATES ARMED FORCES (Submit in triplicate)

SECTION I - APPLICATION

1. FEDERAL FIREARMS LICENSE (If Any)		2. TELEPHONE NO.	3. COUNTRY OF EXPORTATION
LICENSE NO. 6-03-006-11-9B-33164	EXPIRATION DATE 5-1-99	802-527-1252	Romania
4. RETURN APPROVED PERMIT TO (Enter name, address and ZIP Code if different than applicant's) Century Arms, Inc. 48 Lower Newton Street St. Albans, VT 05478		5. APPLICANT'S NAME AND ADDRESS (Including ZIP Code) Same as item 4	
6. NAME AND ADDRESS OF FOREIGN SELLER Ratmil Bucharest, Romania		7. NAME AND ADDRESS OF FOREIGN SHIPPER Same as item 6	

8. DESCRIPTION OF FIREARMS AND AMMUNITION (For firearms, enter (SG) - Shotgun; (R) - Rifle; (P) - Pistol; (RE) - Revolver)

	NAME AND ADDRESS OF MANUFACTURER a	TYPE (30) (R) (P) (RE) b	CALIBER GAUGE OR SIZE c	MODEL (MFRS) DESIGN d	LENGTH OF BARREL e	OVERALL LENGTH (Inches) f	SERIAL NO. g	NEW (N) OR USED (U) h	QUANTITY (Each type) i	UNIT COST j
FIREARMS	Ratmil, Romania	RI	7.62 x39	AK	16"	36"		N	10,000	\$115
AMMUNITION	Title 27 CFR Part 178.92 requires that within 15 days after release from Customs custody, each firearm imported shall be identified by engraving or casting on the frame or receiver the serial number, and on the frame, receiver or barrel the following (1) model, (2) caliber or gauge, (3) name of manufacturer and country where manufactured, and (4) the name, city and state of the importer.									
IMPLEMENTS OF WAR	(See Art I thru XII (Except Firearms & ammunition) of U.S. Munitions Import List, 27 CFR Part 47) Ratmil, Romania			5-rd magazine for above					50,000	N/C

9. SPECIFIC PURPOSE OF IMPORTATION (Use additional sheets, if necessary)

For resale to FFL dealers.. The above firearms are identical to the guns in the attached ad

10. ARE YOU REGISTERED PURSUANT TO THE ARMS EXPORT CONTROL ACT OF 1976 ☒ YES ☐ NO	11. IF "YES", GIVE REGISTRATION NO. A-68-295-1024
--	--

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of knowledge and belief, it is true, correct, and complete.

12. SIGNATURE OF APPLICANT <i>Scott Corrigan</i>	13. TITLE Scott Corrigan - Manager	14. DATE 6-12-97
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SECTION II - FOR ATF USE ONLY (Please make no entries in this section)

15. THE APPLICATION HAS BEEN EXAMINED AND THE IMPORTATION OF THE FIREARMS, AMMUNITION, AND IMPLEMENTS OF WAR DESCRIBED HEREIN IS:

- ☒ APPROVED
- ☐ PARTIALLY APPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER
- ☐ DISAPPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER

RECEIVED
JUN 16 1997

16. SIGNATURE OF THE DIRECTOR, BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

17. DATE

JUN 27 1997

Form Approved: OMB No. 1512-0017

FOR ATF USE ONLY

 PERMIT NO.
97-09510
 VALID FOR 12 MONTHS AFTER THE
 DATE OF APPROVAL (ITEM 17
 BELOW)

 DEPARTMENT OF THE TREASURY
 BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
**APPLICATION AND PERMIT FOR IMPORTATION OF FIREARMS
 AMMUNITION AND IMPLEMENTS OF WAR**

FOR USE BY MEMBERS OF THE UNITED STATES ARMED FORCES (Submit in triplicate)

SECTION I - APPLICATION

1. FEDERAL FIREARMS LICENSE (If Any)		2. TELEPHONE NO.	3. COUNTRY OF EXPORTATION
LICENSE NO. 6-03-006-11-9E-33164	EXPIRATION DATE 5-1-99	802-527-1252	Romania
4. RETURN APPROVED PERMIT TO (Enter name, address and ZIP Code if different than applicant's) Century Arms, Inc. 48 Lower Newton Street St. Albans, VT 05478		5. APPLICANT'S NAME AND ADDRESS (Including ZIP Code) Same as item 4	
6. NAME AND ADDRESS OF FOREIGN SELLER Ratmil Bucharest, Romania		7. NAME AND ADDRESS OF FOREIGN SHIPPER Same as item 6	

OCT 10 REC'D

8. DESCRIPTION OF FIREARMS AND AMMUNITION (For firearms, enter (SG) - Shotgun; (RI) - Rifle; (PI) - Pistol; (RE) - Revolver)

NAME AND ADDRESS OF MANUFACTURER	TYPE (SG, RI, PI, RE)	GAUGE OR SIZE	MODEL (MFRS) DESIGN	LENGTH OF BARREL	OVERALL LENGTH (Inches)	SERIAL NO.	NEW OR USED (Y/N)	QUANTITY (Each type)	UNIT COST
Ratmil, Romania	RI	7.62 X39	WUM-1	19"	34"		N	25,000	\$70.00
Ratmil, Romania	RI	5.45 X39	WUM-1	19"	34"		N	25,000	\$70.00
	(Ball Wad- cutler, Shot, etc.)								

9. SPECIFIC PURPOSE OF IMPORTATION (See Part 178.92 requires that within 15 days after release from Customs custody, each firearm imported shall be identified by engraving or casting on the frame or receiver the serial number, and on the frame, receiver or the barrel the following: (1) model, (2) caliber or gauge, (3) name of city and State of the importer.)

NOTE: UPON THE DATE OF ENACTMENT OF THE VIOLENCE AGAINST WOMEN AND LAW ENFORCEMENT ACT OF 1994 (CRIM. 111), THIS PERMIT DOES NOT AUTHORIZE THE IMPORTATION OF ANY AMMUNITION MAGAZINE, DRUM, BELT FEED, OR SIMILAR DEVICE WITH A CAPACITY OF MORE THAN 10 ROUNDS OF AMMUNITION. PLEASE NOTE: THIS RESTRICTION DOES NOT APPLY TO AN ATTACHED TUNING DEVICE DESIGNED TO ADJUST AND CAPABLE OF OPERATING ONLY WITH 22-CALIBER-RPM AMMUNITION.

For resale to FFL dealers.

10. ARE YOU REGISTERED PURSUANT TO THE ARMS EXPORT CONTROL ACT OF 1976	11. IF "YES", GIVE REGISTRATION NO.
☐ YES ☐ NO	A-68-295-1024
Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of knowledge and belief, it is true, correct, and complete.	
12. SIGNATURE OF APPLICANT	13. TITLE
<i>Scott Corrigan</i>	Scott Corrigan - Manager
14. DATE	
10-10-97	

SECTION II - FOR ATF USE ONLY (Please make no entries in this section)

15. THE APPLICATION HAS BEEN EXAMINED AND THE IMPORTATION OF THE FIREARMS, AMMUNITION, AND IMPLEMENTS OF WAR DESCRIBED HEREIN IS:

- ☒ APPROVED
- ☐ PARTIALLY APPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER
- ☐ DISAPPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER

16. SIGNATURE OF THE DIRECTOR, BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

17. DATE
OCT 21 1997

10/22/97

Lyn, Howard, Brian

4 pgs.

Form Approved: OMB No. 1512-0017

FOR ATF USE ONLY

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMSAPPLICATION AND PERMIT FOR IMPORTATION OF FIREARMS,
AMMUNITION AND IMPLEMENTS OF WAR

NOT FOR USE BY MEMBERS OF THE UNITED STATES ARMED FORCES (Submit in triplicate)

PERMIT NO. **97-09511**
VALID FOR 12 MONTHS AFTER THE
DATE OF APPROVAL (ITEM 17
BELOW)

SECTION I - APPLICATION

1. FEDERAL FIREARMS LICENSE (If Any)		2. TELEPHONE NO.		3. COUNTRY OF EXPORTATION	
LICENSE NO. 6-03-006-11-9E-33164	EXPIRATION DATE 5-1-99	802-527-1252		Egypt	
4. RETURN APPROVED PERMIT TO (Enter name, address and ZIP Code if different than applicant's) Century Arms, Inc, 48 Lower Newton Street St. Albans, VT 05478		5. APPLICANT'S NAME AND ADDRESS (Including ZIP Code) Same as item 4			
6. NAME AND ADDRESS OF FOREIGN SELLER Maadi, Cairo, Egypt		7. NAME AND ADDRESS OF FOREIGN SHIPPER Same as item 6			
8. DESCRIPTION OF FIREARMS AND AMMUNITION (For firearms, enter (SG) - Shotgun; (RI) - Rifle; (PI) - Pistol; (RE) - Revolver)					
NAME AND ADDRESS OF MANUFACTURER a	TYPE (SG, RI, PI, RE) b	CALIBER GAUGE OR SIZE c	MODEL (MFRS) DESIGN d	LENGTH OF BARREL e	OVERALL LENGTH (Inches) f
Maadi, Egypt	RI	.223	M1SR	19"	39"
Maadi, Egypt	RI	7.62 X39	M1SR	19"	39"
AMMUNITION NOTE: UPON THE DATE OF ENACTMENT OF THE VIOLENT CRIME CONTROL AND LAW ENFORCEMENT ACT OF 1994 (CRIME BILL), THIS PERMIT DOES NOT AUTHORIZE THE IMPORTATION OF ANY AMMUNITION MAGAZINE, INJURY, BELL, FRED STROU, OR SIMILAR DEVICE HAVING A CAPACITY OF MORE THAN 10 ROUNDS. THIS INSTRUCTION DOES APPLY TO ALL ATTACHED TUBULAR DEVICE DESIGNED TO ACCEPT AMMUNITION AND CAPABLE OF OPERATING ONLY WITH .22 CALIBER AMMUNITION.		TITLE 27 CFR Part 178.92 requires that within 15 days after release from Customs custody, each firearm imported shall be identified by engraving or casting on the frame or receiver the serial number, and on the frame, receiver or the barrel the following (1) model, (2) caliber or gauge, (3) name of manufacturer and country where manufactured and (4) the name, city and State of the importer.			
IMPLEMENTS OF WAR (See Art I thru XII (Except Firearms & Ammunition) of U.S. Munitions Import List, 27 CFR Part 47)					
9. SPECIFIC PURPOSE OF IMPORTATION (Use additional sheets, if necessary) For resale to FXL dealers.					

10. ARE YOU REGISTERED PURSUANT TO THE ARMS EXPORT CONTROL ACT OF 1978 ☐ YES ☐ NO11. IF "YES", GIVE REGISTRATION NO.
A-68-295-1024

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of knowledge and belief, it is true, correct, and complete.

12. SIGNATURE OF APPLICANT

13. TITLE

Scott Corrigan - Manager

14. DATE

10-10-97

SECTION II - FOR ATF USE ONLY (Please make no entries in this section)

15. THE APPLICATION HAS BEEN EXAMINED AND THE IMPORTATION OF THE FIREARMS, AMMUNITION, AND IMPLEMENTS OF WAR DESCRIBED HEREIN IS:

- ☒ APPROVED
- ☐ PARTIALLY APPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER
- ☐ DISAPPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER

16. SIGNATURE OF THE DIRECTOR, BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

17. DATE

OCT 20 1997

BSM



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, DC 20226

DEC - 3 1997

VIA OVERNIGHT MAIL

Century Arms, Inc.
48 Lower Newton Street
St. Albans, VT 05478

Gentlemen:

The purpose of this letter is to update the information contained in our November 17, 1997, letter regarding the importation of certain semiautomatic rifles into the United States.

As explained in our letter, the President and the Secretary on November 14, 1997, determined to conduct a review as to whether modified semiautomatic assault-type rifles are properly importable under the sporting purposes test of 18 U.S.C. § 925(d)(3). In consideration of the public health and safety, including the numbers of firearms approved for importation and pending import applications, it was determined that approved permits for these rifles should be suspended while this review is being conducted. It was also determined that pending and future applications to import these weapons should not be acted upon until the completion of the review.

In addition to the approved import permits identified in our November 17 letter, the following approved import permits for the import of receivers only were suspended on November 14, 1997:

<u>Receiver Model</u>	<u>Permit Number</u>
MISR	96-10236
L1A1	96-10759
L1A1	97-09509

We intend to complete the review within 120 days.

The U.S. Customs Service has been directed not to release any of the questioned rifles for entry into the commerce of the United States. However, pursuant to 18 U.S.C. § 925(a)(1), the rifles may be imported for sale to governmental entities, including law enforcement agencies, upon submission of a new permit application accompanied by purchase orders and ATF's issuance of new permits. In addition, upon execution of a Customs bond, you may be authorized by the Customs Service to remove these weapons for storage at your premises or other suitable premises pending the review. If Customs permits such removal, the weapons would remain under Customs custody and could not be distributed in the commerce of the United States.

- 2 -

Century Arms, Inc.

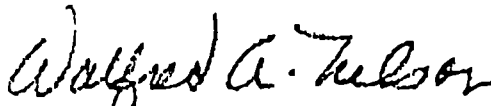
Any of the weapons in Customs' custody may also be exported with the appropriate export license. ATF will assist you in dealing with the Department of State regarding the required export license. Further, as you know, firearms subject to the suspension which have not yet entered the United States may be sold in markets outside the United States.

During the 120-day review period, ATF will study the modified semiautomatic assault-type rifles to determine whether they are importable under the sporting purposes test and will not make a final decision until the review is concluded. You may, within 30 days of receipt of this letter, submit any information or materials that you believe would assist ATF in conducting the review. Any materials submitted by you will be carefully considered in the study.

This suspension is not a permanent revocation of the import permits listed above. Before any decision is made to revoke your permits, you will be given specific notice and an opportunity to respond.

Should you have any questions concerning this action or your opportunity for input into the decision, please contact the Firearms and Explosives Imports Branch at (202)927-8320.

Sincerely yours,



Walfred A. Nelson
Chief, Firearms, Explosives, and
Arson Services Division

DEPARTMENT OF THE TREASURY - BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
**APPLICATION AND PERMIT FOR IMPORTATION OF FIREARMS,
 AMMUNITION AND IMPLEMENTS OF WAR**
 NOT FOR USE BY MEMBERS OF THE UNITED STATES ARMED FORCES
 (Submit in triplicate)

FOR ATF USE ONLY

PERMIT NO.
96-10236VALID FOR 12 MONTHS AFTER THE
DATE OF APPROVAL (ITEM 17 BELOW)

SECTION I - APPLICATION

1. FEDERAL FIREARMS LICENSE (If Any)		2. TELEPHONE NO.	3. COUNTRY OF EXPORTATION
LICENSE NO. 6-03-006-11-9E-33164	EXPIRATION DATE 5-1-99	802-527-1252	Egypt
4. RETURN APPROVED PERMIT TO (Enter name, address and ZIP Code if different than applicant's) Century Arms, Inc. 48 Lower Newton Street St. Albans, VT 05478		5. APPLICANT'S NAME AND ADDRESS (Including ZIP Code) Same as item 4	
6. NAME AND ADDRESS OF FOREIGN SELLER Maadi Cairo, Egypt		7. NAME AND ADDRESS OF FOREIGN SHIPPER Same as item 6	

8. DESCRIPTION OF FIREARMS AND AMMUNITION (For firearms, enter (SG) - Shotgun; (R) - Rifle; (PI) - Pistol; (RE) - Revolver)

NAME AND ADDRESS OF MANUFACTURER a	TYPE (SG, R, PI, RE) b	CALIBER GAUGE OR SIZE c	MODEL (MFG'S) DESIGN d	LENGTH OF BARREL e	OVTALL LENGTH (Inches) f	SERIAL NO. g	NEW(N) OR USED(U) h	QUANTITY (Each type) i	UNIT COST j
Maadi, Egypt	Receiver only	7.62 x39	MISR	N/A	N/A		N	9000	\$40
" "	Receiver	.223	MISR	N/A	N/A		N	9000	\$40
Title 27 CFR Part 178.92 requires that within 15 days after release from Customs custody, each firearm imported must be identified by engraving or casting on the frame or receiver the serial number, and on the frame, receiver or the barrel the following (1) model, (2) caliber or gauge, (3) name of manufacturer, and (4) the name, address and country of manufacture. (See ATF Form 1, 27 CFR Part 47)									

9. SPECIFIC PURPOSE OF IMPORTATION (Use additional sheets, if necessary)

To be assembled into lawfully importable sporter rifles

10. ARE YOU REGISTERED PURSUANT TO THE ARMS EXPORT CONTROL ACT OF 1976 ☒ YES ☐ NO	11. IF "YES", GIVE REGISTRATION NO. A-16-237-1024
--	--

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of knowledge and belief, it is true, correct, and complete.

12. SIGNATURE OF APPLICANT <i>Scott Corrigan</i>	13. TITLE Scott Corrigan - Manager	14. DATE 11-12-96
---	---------------------------------------	----------------------

SECTION II - FOR ATF USE ONLY (Please make no entries in this section)

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- ☐ DISAPPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER

RECEIVED

DEC 16 1996

BY:

16. SIGNATURE OF THE DIRECTOR, BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
Mary Jo Hughes

17. DATE

DEC 05 1996

FILE COPY

U.S. DEPARTMENT OF COMMERCE Bureau of Export Administration U.S. DEPARTMENT OF THE TREASURY Bureau of Alcohol, Tobacco and Firearms U.S. DEPARTMENT OF STATE Office of Munitions Control	INTERNATIONAL IMPORT CERTIFICATE (CERTIFICAT INTERNATIONAL D'IMPORTATION)									
NOTE: Read instructions on the reverse side before completing and submitting this form. (Lire les instructions au verso avant de remplir et de présenter la présente formule.)	Certificate Number 96-10236									
1. U.S. Importer/Importateur (Name and address - Nom et adresse) Century Arms, Inc. 96-NO12-01 48 Lower Newton Street St. Albans, VT 05478	FOR U.S. GOVERNMENT USE (Réserve pour le Gouvernement des Etats-Unis) MSH									
2. Exporter/Rapporteur (Name and address - Nom et adresse) Maadi Cairo, Egypt	If this form has been approved by the Department of Commerce or the Department of State, it is not valid unless the official seal of the Department of Commerce, or the Department of State, appears in this space. If this form is approved by the Treasury Department, a seal is not required. (Si ce formulaire a été approuvé par le Ministère du Commerce, ou le Ministère des Affaires Étrangères, il n'est pas valide à moins qu'un sceau officiel du Ministère du Commerce ou du Ministère des Affaires Étrangères soit apposé sur le document. Si ce formulaire est approuvé par le Ministère des Finances, un sceau officiel n'est pas nécessaire.)									
3. Description of goods (Désignation de la Marchandise)	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">ISUS Anno. No. (Numéro de la liste)</th> <th style="width: 20%;">Quantity (Quantité)</th> <th style="width: 50%;">Value (Valeur) (FOB, CIF, etc.)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">I</td> <td style="text-align: center;">9000</td> <td style="text-align: right;">\$360,000.00</td> </tr> <tr> <td style="text-align: center;">I</td> <td style="text-align: center;">9000</td> <td style="text-align: right;">\$36,000.00</td> </tr> </tbody> </table>	ISUS Anno. No. (Numéro de la liste)	Quantity (Quantité)	Value (Valeur) (FOB, CIF, etc.)	I	9000	\$360,000.00	I	9000	\$36,000.00
ISUS Anno. No. (Numéro de la liste)	Quantity (Quantité)	Value (Valeur) (FOB, CIF, etc.)								
I	9000	\$360,000.00								
I	9000	\$36,000.00								
4. Representation and undertaking of U.S. Importer or principal The undersigned hereby represents that he has undertaken to import into the United States of America under a U.S. Consumption Entry or U.S. Warehouse Entry the commodities in quantities described above, or, if the commodities are not so imported into the United States of America, that he will not divers, transship, or reexport them to another destination except with explicit approval of the Department of Commerce, the Department of State, or the Department of the Treasury, as appropriate. The undersigned also undertakes to notify the appropriate immediately of any changes of fact or intention set forth herein. If a delivery verification is required, the undersigned also undertakes to obtain such verification and make disposition of it in accordance with such requirement. Any false statement willfully made in this declaration is punishable by fine and imprisonment. (See exports from U.S. Code on reverse side.) Déclaration et engagement de l'importateur ou du committant des Etats-Unis Le soussigné déclare par la présente qu'il a pris l'engagement d'importer aux Etats-Unis d'Amérique, en vertu d'une Déclaration américaine de Mise en Consommation, ou d'une Déclaration américaine d'Entrepôt, la quantité de produits ci-dessus, et que, dans le cas où ces produits ne seraient pas ainsi importés aux Etats-Unis d'Amérique, il ne les détournera, ne les transbordera, niles réexportera à destination d'un autre lieu, si ce n'est avec l'approbation explicite du Ministère du Commerce, du Ministère des Affaires Étrangères ou du Ministère des Finances, comme il lui requerra. Le soussigné prend également l'engagement d'aviser le Ministère intéressé des Etats-Unis de tous changements survenus dans les actes ou les intentions énoncés dans la présente déclaration. Si demande est faite d'une confirmation de la livraison, le soussigné prend également l'engagement d'obtenir cette confirmation et d'en disposer de la manière prescrite par cette demande. Toute fausse déclaration faite intentionnellement expose l'auteur aux pénalités prévues par la loi. (Voir Extraits du Code des Etats-Unis au verso.)										
Type or Firm (Préciser d'ici le type ou le nom de l'entreprise) Century Arms, Inc. (Name of Firm or Corporation - Nom de la firme ou de la société) <i>Scott Corrigan</i> Signature of Authorized Official (Signature de l'agent ou employé autorisé)	Type or Firm (Préciser d'ici le type ou le nom de l'entreprise) Scott Corrigan - Manager Name and Title of Authorized Official (Nom et titre de l'agent ou employé autorisé) 11-12-96 Date of Signature (Date de la signature)									
This document ceases to be valid unless presented to the competent foreign authority within six months from its date of issue. (Le présent document perd sa validité s'il n'est pas remis aux autorités étrangères compétentes dans un délai de six mois à compter de sa délivrance.) No import certification may be obtained unless this International Import Certificate has been completed and filed with the appropriate U.S. Government agency (Department of Commerce: 50 U.S.C. app. 42411, E.O. 12214, 15 C.F.R. 4364; Department of the Treasury: 22 U.S.C. 6277b, E.O. 11959, 22 C.F.R. 641; Department of State: 22 U.S.C. 1778, 1779, E.O. 11958, 22 C.F.R. 612). Information furnished herewith is subject to the provisions of Section 12(c) of the Export Administration Act of 1979, 50 U.S.C. app. 2411(c), and its authorized disclosure is prohibited by law.										
FOR U.S. GOVERNMENT USE (Réserve au Gouvernement des Etats-Unis) Certification. This is to certify that the above declaration was made in the U.S. Department of Commerce, State, or Treasury through the undersigned designated official thereof and a copy of this certification is placed in the official file. <i>Mary Jo Hughes</i> / TC Designated Commerce, State, or Treasury Official (Fonctionnaire compétent du Ministère du Commerce, d'Etat, ou du Trésor) Date DEC 05 1996 USCMM 10 84 14										

Bureau of Alcohol, Tobacco and Firearms
Department of the Treasury

DEPARTMENT OF THE TREASURY - BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
**APPLICATION AND PERMIT FOR IMPORTATION OF FIREARMS,
 AMMUNITION AND IMPLEMENTS OF WAR**
 NOT FOR USE BY MEMBERS OF THE UNITED STATES ARMED FORCES
 (Submit in triplicate)

FOR ATF USE ONLY
 PERMIT NO.
96-10759
 VALID FOR 12 MONTHS AFTER THE
 DATE OF APPROVAL (ITEM 17 BELOW)

SECTION I - APPLICATION

1. FEDERAL FIREARMS LICENSE (If Any)		2. TELEPHONE NO.	3. COUNTRY OF EXPORTATION
LICENSE NO. 6-03-006-11-9E-33164	EXPIRATION DATE 5-1-99	802-527-1252	Brazil
4. RETURN APPROVED PERMIT TO (Enter name, address and ZIP Code if different than applicant's) Century Arms, Inc. 48 Lower Newton Street St. Albans, VT 05478		5. APPLICANT'S NAME AND ADDRESS (Including ZIP Code) Same as item 4	
6. NAME AND ADDRESS OF FOREIGN SELLER Imbel Sao Paulo, Brazil		7. NAME AND ADDRESS OF FOREIGN SHIPPER Same as item 6	

8. DESCRIPTION OF FIREARMS AND AMMUNITION (For firearms, enter (SG) - Shotgun; (R I) - Rifle; (PI) - Pistol; (RE) - Revolver)

	NAME AND ADDRESS OF MANUFACTURER a	TYPE (SG), (RI), (PI), (RE) b	CALIBER GAUGE OR SIZE c	MODEL (MFRS.) DESIGN d	LENGTH OF BARREL e	OVERALL LENGTH (Inches) f	SERIAL NO. g	NEW(N) OR USED (U) h	QUANTITY (Each type) i	UNIT COST j
FIREARMS	IMBEL, Brazil	Receiver only	.308	L1A1	n/a	n/a		N	10,000	\$90
AMMUNITION	Title 27 CFR Part 178.92 requires that within 15 days after release from Customs custody, each firearm imported shall be identified by engraving or casting on the frame or receiver the serial number, and on the frame, receiver or the barrel the following (1) model, (2) caliber or gauge, (3) name of manufacturer and country where manufactured and (4) the name, city and State of the importer.									
IMPLEMENTS OF WAR	(See Part I thru XII (Except firearms & ammunition) of U.S. Munitions Import List, 27 CFR Part 47)									

RECEIVED
 DEC 04 1996

9. SPECIFIC PURPOSE OF IMPORTATION (Use additional sheets, if necessary)

To be assembled into lawfully importable sporter rifles. The above are semi-auto only.

10. ARE YOU REGISTERED PURSUANT TO THE ARMS EXPORT CONTROL ACT OF 1976 ☒ YES ☐ NO	11. IF "YES", GIVE REGISTRATION NO. A-68-295-1024
--	--

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of knowledge and belief, it is true, correct, and complete.

12. SIGNATURE OF APPLICANT <i>Scott Corrigan</i>	13. TITLE Scott Corrigan - Manager	14. DATE 11-20-96
---	---------------------------------------	----------------------

SECTION II - FOR ATF USE ONLY (Please make no entries in this section)

15. THE APPLICATION HAS BEEN EXAMINED AND THE IMPORTATION OF THE FIREARMS, AMMUNITION, AND IMPLEMENTS OF WAR DESCRIBED HEREIN IS:

- ☒ APPROVED
☐ PARTIALLY APPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER
☐ DISAPPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER

NOTE: UPON THE DATE OF ENACTMENT OF THE VIOLENT CRIME CONTROL AND LAW ENFORCEMENT ACT OF 1994 (CRIME BILL), THIS PERMIT DOES NOT AUTHORIZE THE IMPORTATION OF ANY AMMUNITION OR OTHER DEVICE HAVING APPLIED TO AN ATTACHED TUBULAR DEVICE DESIGNED TO BE USED IN A RIFLE AND CAPABLE OF OPERATING ONLY WITH .22 CALIBER RIFLE AMMUNITION.

FILE COPY

16. SIGNATURE OF THE DIRECTOR, BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
Mary Jo Boyke

17. DATE
 DEC 16 1996

U.S. DEPARTMENT OF COMMERCE
Bureau of Export Administration
U.S. DEPARTMENT OF THE TREASURY
Bureau of Alcohol, Tobacco and Firearms
U.S. DEPARTMENT OF STATE
Office of Munitions Control

INTERNATIONAL IMPORT CERTIFICATE
(CERTIFICAT INTERNATIONAL D'IMPORTATION)

NOTE: Read instructions on the reverse side before completing and submitting this form. (Lire les instructions au verso avant de remplir et de présenter la présente formule.)

Certificate Number

96-10759

1. U.S. Importer/Importateur (Name and address--Nom et adresse)

Century Arms, Inc. 96-N020-02
48 Lower Newton Street
St. Albans, VT 05478

FOR U.S. GOVERNMENT USE (Réservé pour le Gouvernement des Etats-Unis)

MSH

2. Exporter/Exportateur (Name and address--Nom et adresse)

Imbel
Sao Paulo, Brazil

If this form has been approved by the Department of Commerce or the Department of State, it is not valid unless the official seal of the Department of Commerce, or the Department of State, appears in this space. If this form is approved by the Treasury Department, a seal is not required. (Si ce formulaire a été approuvé par le Ministère du Commerce, ou le Ministère des Affaires Etrangères, il n'est pas valide à moins qu'un sceau officiel du Ministère du Commerce ou du Ministère des Affaires Etrangères soit apposé sur le document. Si ce formulaire est approuvé par le Ministère des Finances, un sceau officiel n'est pas nécessaire.)

3. Description of goods
(Désignation de la Marchandise)

TSUS Anno. No.
(Numéro de la liste)

Quantity
(Quantité)

Value
(Valeur)
(FOB, CIF, etc.)

Receiver only, L1A1, cal. .308, Made in Brazil

I

10,000

\$900,000.00

4. Representation and undertaking of U.S. Importer or principal

The undersigned hereby represents that he has undertaken to import into the United States of America under a U.S. Consumption Entry or U.S. Warehouse Entry the commodities in quantities described above, or, if the commodities are not so imported into the United States of America, that he will not divert, transship, or reexport them to another destination except with explicit approval of the Department of Commerce, the Department of State, or the Department of the Treasury, as appropriate. The undersigned also undertakes to notify the appropriate immediately of any changes of fact or intention set forth herein. If a delivery verification is required, the undersigned also undertakes to obtain such verification and make disposition of it in accordance with such requirement. Any false statement willfully made in this declaration is punishable by fine and imprisonment. (See experts from U.S. Code on reverse side.)

Déclaration et engagement de l'importateur ou du commettant des Etats-Unis

Le soussigné déclare par la présente qu'il a pris l'engagement d'importer aux Etats-Unis d'Amérique, en vertu d'une Déclaration américaine de Mise en Consommation, ou d'une Déclaration américaine d'Entrée en entrepôt, la quantité de produits ci-dessus, et que, dans le cas où ces produits ne seraient pas ainsi importés aux Etats-Unis d'Amérique, il ne les détournera, ne les transbordera, ni les réexportera à destination d'un autre lieu, si ce n'est avec l'approbation explicite du Ministère du Commerce, du Ministère des Affaires Etrangères ou du Ministère des Finances, comme il est requis. Le soussigné prend également l'engagement d'aviser le Ministère intéressé des Etats-Unis de tous changements survenus dans les actes ou les intentions énoncés dans la présente déclaration. Si demande est faite d'une confirmation de la livraison, le soussigné prend également l'engagement d'obtenir cette confirmation et d'en disposer de la manière prescrite par cette demande. Toute fausse déclaration faite intentionnellement expose l'auteur aux pénalités prévues par la loi. (Voir Extrait du Code des Etats-Unis au verso.)

Type or Print
(Ecrire d'écrite
à la machine ou
en caractères
d'imprimerie)

Century Arms, Inc.

Type or Print
(Ecrire d'écrite
à la machine ou
en caractères
d'imprimerie)

Scott Corrigan - Manager

Name of Firm or Corporation
(Nom de la firme ou de la société)

Name and Title of Authorized Official
(Nom et titre de l'agent ou employé autorisé)

Signature of Authorized Official
(Signature de l'agent ou employé autorisé)

Date of Signature
(Date de la signature)

11-20-96

This document ceases to be valid unless presented to the competent foreign authorities within six months from its date of issue. (Le présent document perd sa validité s'il n'est pas remis aux autorités étrangères compétentes dans un délai de six mois à compter de sa délivrance.)

No import certification may be obtained unless this International Import Certificate has been completed and filed with the appropriate U.S. Government agency (Department of Commerce: 50 U.S.C. app. §2411, E.O. 12214, 15 C.F.R. §368; Department of the Treasury: 22 U.S.C. §2778, E.O. 11959, 27 C.F.R. §47; Department of State: 22 U.S.C. 2778, 2779, E.O. 11958, 22 C.F.R. §123). Information furnished herewith is subject to the provisions of Section 12(c) of the Export Administration Act of 1979, 50 U.S.C. app. 2411(c), and its unauthorized disclosure is prohibited by law.

FOR U.S. GOVERNMENT USE (Réservé au Gouvernement des Etats-Unis)

Certification: This is to certify that the above declaration was made in the U.S. Department of Commerce, State, or Treasury through the undersigned designated official thereof and a copy of this certification is placed in the official file.

Certification: Il est certifié par la présente que la déclaration ci-dessus a été faite au Ministère du Commerce, des Affaires Etrangères, ou des Finances des Etats-Unis par l'intermédiaire du fonctionnaire autorisé soussigné de ce Ministère et qu'une copie de ce certificat a été conservée dans les archives officielles.

Designated Commerce, State, or Treasury Official (Fonctionnaire compétent du Ministère du Commerce, d'Etat, ou du Trésor)

Date

DEC 16 1996

USCOMM DC 89-24414

Bureau of Alcohol, Tobacco and Firearm
Department of the Treasury

ORIGINAL COPY

FOR ATF USE ONLY

DEPARTMENT OF THE TREASURY

BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

APPLICATION AND PERMIT FOR IMPORTATION OF FIREARMS

AMMUNITION AND IMPLEMENTS OF WAR

NOT FOR USE BY MEMBERS OF THE UNITED STATES ARMED FORCES (Submit in triplicate)

 PERMIT NO. **09509**
 VALID FOR 12 MONTHS AFTER THE
 DATE OF APPROVAL (ITEM 17
 BELOW)

SECTION I - APPLICATION

1. FEDERAL FIREARMS LICENSE (If Any)

LICENSE NO.

EXPIRATION DATE

G-03-006-11-9E-33164

5-1-99

2. TELEPHONE NO.

802-527-1252

3. COUNTRY OF EXPORTATION

Brazil

4. RETURN APPROVED PERMIT TO (Enter name, address and ZIP Code if different than applicant's)

Century Arms, Inc.

97-OC10-01

48 Lower Newton Street

St. Albans, VT 05478

6. NAME AND ADDRESS OF FOREIGN SELLER

Imbel

Sao Paulo, Brazil

OCT 10 REC'D

5. APPLICANT'S NAME AND ADDRESS (Including ZIP Code)

Same as item 4

7. NAME AND ADDRESS OF FOREIGN SHIPPER

Same as item 6

B. DESCRIPTION OF FIREARMS AND AMMUNITION (For firearms, enter (SG) - Shotgun; (RH) - Rifle; (PI) - Pistol; (RE) - Revolver)

NAME AND ADDRESS OF MANUFACTURER A	TYPE (SG, RH, PI, RE) B	CALIBER GAUGE OR SIZE C	MODEL (MFHS) DESIGN D	LENGTH OF BARREL E	OVERALL LENGTH (Inches) F	SERIAL NO. G	HOW (M) OR USED (L) H	QUANTITY (Each type) I	UNIT COST J
Imbel, Brazil	Receiver Only	.308	L1A1	N/A	N/A		N	25,000	\$90.00
NOTE: UPON THE DATE OF ENACTMENT OF THE VIOLENT CRIME CONTROL AND LAW ENFORCEMENT ACT OF 1994 (CRIME BILL), THIS PERMIT DOES NOT AUTHORIZE THE IMPORTATION OF ANY AMMUNITION MAGAZINE, DRUM, BELT FEED STRIP OR SHOTGUN DEVICE EXCEPT A CAPACITY OF MORE THAN 10 ROUNDS OF AMMUNITION. PLEASE NOTE: THIS RESTRICTION DOES NOT APPLY TO AN ATTACHED TUBULAR DEVICE DESIGNED TO ACCOMMODATE A CAPACITY OF OPERATING ONLY WITH 22 CALIBER AMMUNITION.									
(See Art I thru XII (Except firearms & ammunition) of U.S. Munitions Import List, 27 CFR Part 47)									
Title 27 CFR Part 178.92 requires that within 15 days after release from Customs custody, each firearm imported shall be identified by engraving or casting on the frame or receiver (1) the serial number, and on the frame, receiver or the barrel the following (1) model, (2) caliber or gauge, (3) name of manufacturer and country where manufactured and (4) the name, city and State of the importer.									

9. SPECIFIC PURPOSE OF IMPORTATION (Use additional sheets, if necessary)

The above are semi-auto only. For assembly into lawfully importable sporter rifles.

10. ARE YOU REGISTERED PURSUANT TO THE ARMS EXPORT CONTROL ACT OF 1976

☐ YES ☐ NO

11. IF 'YES', GIVE REGISTRATION NO.

A-68-295-1024

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of my knowledge and belief, it is true, correct, and complete.

12. SIGNATURE OF APPLICANT

13. TITLE

Scott Corrigan - Manager

14. DATE

10-10-97

SECTION II - FOR ATF USE ONLY (Please make no entries in this section)

15. THE APPLICATION HAS BEEN EXAMINED AND THE IMPORTATION OF THE FIREARMS, AMMUNITION, AND IMPLEMENTS OF WAR DESCRIBED HEREIN IS:

- ☒ APPROVED
- ☐ PARTIALLY APPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER
- ☐ DISAPPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER

16. SIGNATURE OF THE DIRECTOR, BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

17. DATE

OCT 20 19



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

DEC 17 1997

VIA OVERNIGHT MAIL

Century Arms, Inc.
48 Lower Newton Street
St. Albans, VT 05478

Gentlemen:

The purpose of this letter is to update the information contained in our November 17 and December 3, 1997, letters regarding the importation of certain semiautomatic rifles into the United States.

As explained in our letters, the President and the Secretary on November 14, 1997, determined to conduct a review as to whether modified semiautomatic assault-type rifles are properly importable under the sporting purposes test of 18 U.S.C. § 925(d)(3). In consideration of the public health and safety, including the numbers of firearms approved for importation and pending import applications, it was determined that approved permits for these rifles should be suspended while this review is being conducted. It was also determined that pending and future applications to import these weapons should not be acted upon until the completion of the review. We intend to complete the review within 120 days.

In addition to the approved import permits identified in our previous letters, the following approved import permit for the import of receivers only was suspended on November 14, 1997:

Receiver Model
Centurion 2000

Permit Number
97-10763

The Firearms and Explosives Imports Branch is in continuous review of applications to import modified, semiautomatic, AK-variant rifles. You should consider suspended any other permits or applications you may possess for the import of AK-variant rifles by whatever name(s) they are designated.

The following pending import permit application also was suspended on November 14, 1997:

Firearm Model
G3

Permit Number
97-09608

- 2 -

Century Arms, Inc.

The U.S. Customs Service has been directed not to release any of the questioned rifles for entry into the commerce of the United States. However, pursuant to 18 U.S.C. § 925(a)(1), the rifles may be imported for sale to governmental entities, including law enforcement agencies, upon submission of a new permit application accompanied by purchase orders and ATF's issuance of new permits. In addition, upon execution of a Customs bond, you may be authorized by the Customs Service to remove these weapons for storage at your premises or other suitable premises pending the review. If Customs permits such removal, the weapons would remain under Customs custody and could not be distributed in the commerce of the United States.

Any of the weapons in Customs' custody may also be exported with the appropriate export license. ATF will assist you in dealing with the Department of State regarding the required export license. Further, as you know, firearms subject to the suspension which have not yet entered the United States may be sold in markets outside the United States.

During the 120-day review period, ATF will study the modified semiautomatic assault-type rifles to determine whether they are importable under the sporting purposes test and will not make a final decision until the review is concluded. You may, within 30 days of receipt of this letter, submit any information or materials that you believe would assist ATF in conducting the review. Any materials submitted by you will be carefully considered in the study.

This suspension is not a permanent revocation of the import permit and permit application listed above. Before any decision is made to revoke or deny your permit or application, you will be given specific notice and an opportunity to respond.

Should you have any questions concerning this action or your opportunity for input into the decision, please contact the Firearms and Explosives Imports Branch at (202)927-8320.

Sincerely yours,



Walfred A. Nelson
Chief, Firearms, Explosives, and
Arson Services Division

Form Approved: OMD No. 1512-0017

DEPARTMENT OF THE TREASURY - BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
**APPLICATION AND PERMIT FOR IMPORTATION OF FIREARMS,
 AMMUNITION AND IMPLEMENTS OF WAR**
 NOT FOR USE BY MEMBERS OF THE UNITED STATES ARMED FORCES
 (Submit in triplicate)

FOR ATF USE ONLY
 PERMIT NO.
96-10763
 VALID FOR 12 MONTHS AFTER THE
 DATE OF APPROVAL (ITEM 17 BELOW)

SECTION I - APPLICATION

1. FEDERAL FIREARMS LICENSE (If Any) LICENSE NO. 6-03-006-11-9E-33164 EXPIRATION DATE 5-1-99		2. TELEPHONE NO. 802-527-1252	3. COUNTRY OF EXPORTATION Greece
4. RETURN APPROVED PERMIT TO (Enter name, address and ZIP Code if different than applicant's) Century Arms, Inc. 48 Lower Newton Street St. Albans, VT 05478		5. APPLICANT'S NAME AND ADDRESS (Including ZIP Code) Same as item 4	
6. NAME AND ADDRESS OF FOREIGN SELLER Hellenic Arms Athens, Greece		7. NAME AND ADDRESS OF FOREIGN SHIPPER Same as item 6	

8. DESCRIPTION OF FIREARMS AND AMMUNITION (For firearms, enter (SG) - Shotgun, (R) - Rifle, (P) - Pistol, (HE) - Revolver)

NAME AND ADDRESS OF MANUFACTURER a	TYPE (SG), (R), (P), (HE) b	CALIBER GALGEE OR SIZE c	MODEL (M.F.S.) DESIGN d	LENGTH OF BARREL e	OVERALL LENGTH (inches) f	SERIAL NO. g	NEW OR USED (If h)	QUANTITY (Each type) i	UNIT COST j
Hellenic, Greece	Receiver only	.308	Centurion 2000	n/a	n/a		N	4000	\$104
Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of my knowledge and belief, it is true, correct, and complete. 12. SIGNATURE OF APPLICANT: <i>Scott Corrigan</i> 13. TITLE: Scott Corrigan - Manager 14. DATE: 11-27-96									

9. SPECIFIC PURPOSE OF IMPORTATION (Use additional sheets, if necessary) For assembly into lawfully importable sporter rifle. These receivers are identical to those previously approved for import in your letter dated 7-29-96 copy attached.

10. ARE YOU REGISTERED PURSUANT TO THE ARMS EXPORT CONTROL ACT OF 1976 ☒ YES ☐ NO

11. IF "YES", GIVE REGISTRATION NO.
A-68-295-1024

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of my knowledge and belief, it is true, correct, and complete.

12. SIGNATURE OF APPLICANT

13. TITLE

Scott Corrigan - Manager

14. DATE

11-27-96

SECTION II - FOR ATF USE ONLY (Please make no entries in this section)

15. THE APPLICATION HAS BEEN EXAMINED AND THE IMPORTATION OF THE FIREARMS, AMMUNITION, AND IMPLEMENTS OF WAR DESCRIBED HEREIN IS:

- ☒ APPROVED
- ☐ PARTIALLY APPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER
- ☐ DISAPPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER

16. SIGNATURE OF THE DIRECTOR, BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

ATF FORM 6 - PART 1 (5330.2A) (9-92) PREVIOUS EDITIONS ARE OBSOLETE

17. DATE
JAN 08 1997

Form Approved: OMB No. 1512-0017
FOR ATF USE ONLY

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
APPLICATION AND PERMIT FOR IMPORTATION OF FIREARMS,
AMMUNITION AND IMPLEMENTS OF WAR

NOT FOR USE BY MEMBERS OF THE UNITED STATES ARMED FORCES (Submit in triplicate)

97 PERMIT NO. 09508
VALID FOR 12 MONTHS AFTER THE
DATE OF APPROVAL (ITEM 17
BELOW)

SECTION I - APPLICATION

1. FEDERAL FIREARMS LICENSE (If Any)

LICENSE NO. 6-03-006-11-9E-33164
EXPIRATION DATE 9-1-99

2. TELEPHONE NO. 802-527-1252

3. COUNTRY OF EXPORTATION
Greece

4. RETURN APPROVED PERMIT TO (Enter name, address and ZIP Code if different than applicant's)

Century Arms, Inc. 97-0C10-09
48 Lower Newton Street
St. Albans, VT 05478

6. APPLICANT'S NAME AND ADDRESS (Including ZIP Code)

Same as item 4

6. NAME AND ADDRESS OF FOREIGN SELLER

Hellenic Arms
Athens, Greece

7. NAME AND ADDRESS OF FOREIGN SHIPPER

Same as item 6

8. DESCRIPTION OF FIREARMS AND AMMUNITION (For firearms, enter (SG) - Shotgun; (R) - Rifle; (P) - Pistol; (RE) - Revolver)

NAME AND ADDRESS OF MANUFACTURER	TYPE (R) (P) (SG) (RE)	CALIBER GAUGE OR SIZE	MODEL (MFRS) DESIGN	LENGTH OF BARREL	OVERALL LENGTH (Inches)	SERIAL NO.	NEW OR USED (N)	QUANTITY (Each type)	UNIT COST
Hellenic Arms, Greece Receiver only		.308	Centuron 2000	N/C	N/C		N	30,000	\$80.00
(See Art I thru XII (Except firearms & ammunition) of U.S. Munitions Import List, 27 CFR Part 47)	(Ball, Wad, slug, etc.)								

Two 27 CFR Part 173.92 requires that within 15 days after release from Customs custody, each firearm imported shall be identified by engraving or casting on the frame or receiver the number, and on the frame, receiver or the barrel the following: (1) model, (2) caliber or gauge, (3) name of manufacturer and country where manufactured and (4) the name, city and State of the importer.

NOTE: UPON THE DATE OF ENACTMENT OF THE VIOLATION CONTROL AND LAW ENFORCEMENT ACT OF 1994 (CRIME BILL) THIS PERMIT DOES NOT AUTHORIZE THE IMPORTATION OF ANY AMMUNITION: MAGAZINE, DRUM, BELT, FEED STRIP (OR SIMILAR DEVICE) HAVING A CAPACITY OF MORE THAN 10 ROUNDS OF AMMUNITION. PLEASE NOTE: THIS RESTRICTION DOES NOT APPLY TO AN ATTACHED TUBULAR DEVICE DESIGNED TO ACCEPT AND CHAMBER ONE OF FEWER THAN 10 ROUNDS OF RIFLE AMMUNITION.

9. SPECIFIC PURPOSE OF IMPORTATION (Use additional sheets, if necessary)

For assembly into lawfully importable sporter rifles. The above are semi-auto only and have been previously approved for importation.

10. ARE YOU REGISTERED PURSUANT TO THE ARMS EXPORT CONTROL ACT OF 1976 ☒ YES ☐ NO

11. IF "YES", GIVE REGISTRATION NO.
A-68-295-1024

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of knowledge and belief, it is true, correct, and complete.

12. SIGNATURE OF APPLICANT

13. TITLE

Scott Corrigan - Manager

14. DATE
10-10-97

SECTION II - FOR ATF USE ONLY (Please make no entries in this section)

15. THE APPLICATION HAS BEEN EXAMINED AND THE IMPORTATION OF THE FIREARMS, AMMUNITION, AND IMPLEMENTS OF WAR DESCRIBED HEREIN IS:

- ☒ APPROVED
☐ PARTIALLY APPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER
☐ DISAPPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER

16. SIGNATURE OF THE DIRECTOR, BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

BSM

17. DATE
OCT 20 1997



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, DC 20226

F:SD:FEI:EO
5330

MAR 16 1998

Century Arms, Inc.
48 Lower Newton Street
St. Albans, VT 05478

Gentlemen:

The purpose of this letter is to update you on the recent actions relating to the importation of certain semiautomatic rifles into the United States.

As explained in our previous letter(s), on November 14, 1997, the President and the Secretary of the Treasury determined to conduct a review as to whether modified semiautomatic assault-type rifles are properly importable under the sporting purpose test of 18 U.S.C. § 925(d)(3). It was decided that approved permits for these rifles should be suspended while the review was being conducted. It also was decided that pending and future applications to import these weapons should not be acted upon until the completion of the review.

Our previous letter(s) indicated that we would complete the review of these permits within 120-days. However, in order to fully consider all the information relating to these firearms, it is necessary to extend the review beyond the 120-day period. We expect to complete the review within 2 weeks and will notify you when determinations concerning your permits have been made.

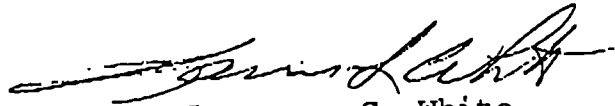
As previously stated, approved permits for modified semiautomatic assault-type rifles will remain suspended until completion of the review. Pending and future applications to import these rifles also will not be acted upon until completion of the review.

- 2 -

Once again, we emphasize that the suspension is not a permanent revocation of your import permits. Before any decision is made to revoke your permits, you will be given specific notice and an opportunity to respond.

Should you have any questions concerning this action, please contact the Firearms and Explosives Imports branch at (202) 927-8320.

Sincerely yours,



Lawrence G. White
Acting Chief
Firearms and Explosives Imports Branch



DIRECTOR

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, DC 20226

APR 8 1998

F:SD:FEI:EO
5330

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Century Arms, Inc.
48 Lower Newton Street
St. Albans, VT 05478

Gentlemen:

By letter dated November 14, 1997, you were advised that the Bureau of Alcohol, Tobacco and Firearms has suspended your import permits to import certain semiautomatic rifles while the Department of the Treasury conducted a study to determine whether these firearms meet the requirements for importation under the Gun Control Act of 1968, as amended.

Treasury has completed its study and has determined that the semiautomatic rifles do not meet the statutory requirements for importation. Specifically, 18 U.S.C. § 925(d)(3), provides in pertinent part that:

The Secretary shall authorize a firearm . . . to be imported or brought into the United States . . . if the firearm...

(3) is of a type that . . . is generally recognized as particularly suitable for or readily adaptable to sporting purposes, excluding surplus military firearms. . .

Treasury has determined that modified semiautomatic assault-type rifles such as those you propose to import do not qualify for importation under the statute, and that the permits issued to import these rifles should be revoked. The basis for this determination is set forth in detail in the enclosed Study on the Sporting Suitability of Modified Semiautomatic Assault Rifles.

- 2 -

Century Arms, Inc.

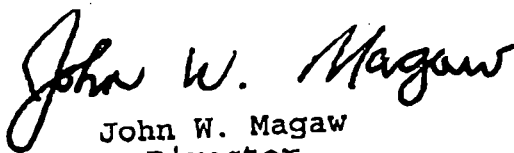
Accordingly, your permit(s) to import the following model(s) of firearms on the permit number(s) indicated below has/have been proposed for revocation.

<u>Firearm Model</u>	<u>Permit Number</u>
MISR	96-10234
AK (WUM-1)	97-05558
WUM-1	97-09510
MISR	97-09511

This notice does not constitute a final decision. If you disagree with the proposed action, please submit your written comments and any relevant materials within 30 days of receipt of this letter. Any materials submitted by you will be carefully considered in making a final decision. If you elect not to provide any written comments or additional material within that period, we will issue a final decision based on the information already available to the Bureau. In either case, you will be notified promptly of the final decision in this matter.

Should you have any questions concerning this action or your opportunity for input into the decision, please contact Lawrence G. White, Chief, Firearms and Explosives Imports branch, at (202) 927-8320.

Sincerely yours,


John W. Magaw
Director

Enclosure



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, DC 20226

APR 08 1998

F:SD:FEI:EO
5330

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Century Arms, Inc.
48 lower Newton Street
St. Albans, VT 05478

Gentlemen:

By letter dated November 19, 1997, you were advised that the Bureau of Alcohol, Tobacco and Firearms suspended your import permits to import certain receivers and/or receivers with barrels attached while the Department of the Treasury conducted a study to determine whether these firearms meet the requirements for importation under the Gun Control Act of 1968, as amended.

Treasury has completed its study and has determined that certain semiautomatic rifles do not meet the statutory requirements for importation. Specifically, 18 U.S.C. § 925(d)(3), provides in pertinent part that:

The Secretary shall authorize a firearm . . .
to be imported or brought into the United States
. . . if the firearm . . .

(3) is of a type that . . . is generally
recognized as particularly suitable for or
readily adaptable to sporting purposes,
excluding surplus military firearms. . .

Treasury has determined that modified semiautomatic assault rifles do not qualify for importation under the statute. The basis for this determination is set forth in detail in the enclosed Study on the Sporting Suitability of Modified Semiautomatic Assault Rifles. Since the receivers and/or receivers with barrels attached authorized for importation on your permits may be assembled into rifles that are not importable under the standards set forth in the Study, we have determined that these permits should be revoked.

- 2 -

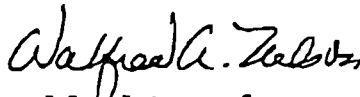
Century Arms, Inc.

This notice does not constitute a final decision. If you disagree with the proposed action, please submit your written comments and any relevant materials within 30 days of receipt of this letter. Any materials submitted by you will be carefully considered in making a final decision. If you elect not to provide any written comments or additional material within that period, we will issue a final decision based on the information already available to the Bureau. In either case, you will be notified promptly of the final decision in this matter.

You may submit new application(s) to import these receivers and/or receivers with barrels attached, which will be approved for importation if they can be assembled as a firearm that qualifies for importation under 18 U.S.C. § 925(d)(3). ATF will review the applications and request samples for examination when necessary. Any permits for such items would be issued with an appropriate restriction.

Should you have any questions concerning this action or your opportunity for input into the decision, please contact Lawrence G. White, Chief, Firearms and Explosives Imports Branch, at (202) 927-8320.

Sincerely yours,



Walfred A. Nelson
Deputy Assistant Director
Firearms, Explosives and Arson

Enclosure

04/27/98 MON 14:30 FAX

001



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, DC 20226

APR 10 1998

F:SD:FEI:EO
5330

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Century Arms, Inc.
48 Lower Newton Street
St. Albans, VT 05478

Gentlemen:

By letter dated November 14, 1997, you were advised that the Bureau of Alcohol, Tobacco and Firearms is holding your pending application(s) to import certain semiautomatic rifles while the Department of the Treasury conducted a study to determine whether these firearms meet the requirements for importation under the Gun Control Act of 1968, as amended.

Treasury has completed its study and has determined that the semiautomatic rifles do not meet the statutory requirements for importation. Specifically, 18 U.S.C. § 925(d)(3), provides in pertinent part that:

The Secretary shall authorize a firearm . . . to be imported or brought into the United States . . . if the firearm...

(3) is of a type that . . . is generally recognized as particularly suitable for or readily adaptable to sporting purposes, excluding surplus military firearms . . .

Treasury has determined that modified semiautomatic assault-type rifles such as those you propose to import do not qualify for importation under the statute, and that the application(s) pending to import these rifles should be denied. The basis for this determination is set forth in detail in the enclosed Study on the Sporting Suitability of Modified Semiautomatic Assault Rifles.

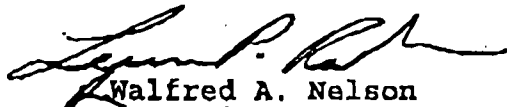
- 2 -

Century Arms, Inc.

This notice does not constitute a final decision. If you disagree with the proposed action, please submit your written comments and any relevant materials within 30 days of receipt of this letter. Any materials submitted by you will be carefully considered in making a final decision. If you elect not to provide any written comments or additional material within that period, we will issue a final decision based on the information already available to the Bureau. In either case, you will be notified promptly of the final decision in this matter.

Should you have any questions concerning this action or your opportunity for input into the decision, please contact Lawrence G. White, Chief, Firearms and Explosives Imports Branch, at (202) 927-8320.

Sincerely yours,



Walfred A. Nelson
Deputy Assistant Director
Firearms, Explosives and Arson

Enclosure

Form Approved: OMB No. 1512-0017
FOR OFFICE USE ONLY

**APPLICATION AND PERMIT FOR IMPORTATION OF FIREARMS,
AMMUNITION AND IMPLEMENTS OF WAR**

NOT FOR USE BY MEMBERS OF THE UNITED STATES ARMED FORCES (Submit in triplicate)

PERMIT NO.

VALID FOR 12 MONTHS AFTER THE
DATE OF APPROVAL (ITEM 17
BELOW)

SECTION I - APPLICATION

1. FEDERAL FIREARMS LICENSE (If Any)		2. TELEPHONE NO.	3. COUNTRY OF EXPORTATION
LICENSE NO.	EXPIRATION DATE		
6-03-006-11-9E-33164	5-1-99	802-527-1252	Turkey
4. RETURN APPROVED PERMIT TO (Enter name, address and ZIP Code if different than applicant's)		5. APPLICANT'S NAME AND ADDRESS (Including ZIP Code)	
Century Arms, Inc. 48 Lower Newton Street St., Albans, VT 05478		Same as item 4	
6. NAME AND ADDRESS OF FOREIGN SELLER		7. NAME AND ADDRESS OF FOREIGN SHIPPER	
MKAK Ankara, Turkey		Same as item 6	

D. DESCRIPTION OF FIREARMS AND AMMUNITION (For firearms, enter (SG) - Shotgun; (R) - Rifle; (P) - Pistol; (RE) - Revolver)

[illegible]

9. SPECIFIC PURPOSE OF IMPORTATION (Use additional sheets, if necessary)

For submission to BATF to determine importability.

10. ARE YOU REGISTERED PURSUANT TO THE ARMS EXPORT CONTROL ACT OF 1976 ☒ YES ☐ NO

11. IF "YES", GIVE REGISTRATION NO. A-68-295-1024

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of knowledge and belief, it is true, correct, and complete.

12. SIGNATURE OF APPLICANT 	13. TITLE Scott Corrigan - Manager	14. DATE Aug. 8, 1997
---	---------------------------------------	--------------------------

SECTION II - FOR ATF USE ONLY (Please make no entries in this section)

15. THE APPLICATION HAS BEEN EXAMINED AND THE IMPORTATION OF THE FIREARMS, AMMUNITION, AND IMPLEMENTS OF WAR DESCRIBED HEREIN IS:

☒ APPROVED

☐ PARTIALLY APPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER

☐ DISAPPROVED FOR THE REASON INDICATED HERE OR ON ATTACHED LETTER

16. SIGNATURE OF THE DIRECTOR, BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

17. DATE
SEP - 2 1997



RECEIVED
MAY 04 1998

DOMINION IMPORT GROUP, LTD.

5051 Euclid Road • Virginia Beach, VA 23462

(757) 473-3535 • FAX (757) 490-6079

BY CERTIFIED MAIL.
RETURN RECEIPT REQUESTED

APRIL 29, 1998

John W. Magaw
Director
Bureau of Alcohol, Tobacco and Firearms
U.S. Department of the Treasury
650 Massachusetts Avenue, N.W.
Washington, D.C. 20226

RE: The revocation of Import permits 97-04948, 97-05698 and 9706265.

Dear Director Magaw,

In response to your letter of April 8, 1998, Dominion Import Group, Ltd. does hereby appeal the decision to deny or revoke the above listed import permits as the rifles in question do meet the sporting criteria set out in the Gun Control Act of 1968, 18 U.S.C. S 925(d). We beleive that the Department of the Treasury Study on the Sporting Suitability of Modified Semiautomatic Rifles (April 1998) is based on legal errors and factual inaccuracies.

We hereby incorporate by reference all records and evidence of every kind whatever known to the Department of the Treasury when it determined that the subject rifles or types of rifles did meet the sporting test, as well as when it determined that they did not meet the test. These records and evidence thereby include that which was before Treasury in 1968 when it first determined that such rifle types met the sporting test, when it first determined during or after your 1989 study that the specific subject rifles and types met the sporting test, and all other records and evidence available to the Department through the present. These records and evidence include not only submissions by this firm but also submissions by all interested persons and entitles whatever for the entire period of 1968 to the present.

18 U.S.C. S 925(d) provides in part.

The Secretary shall authorize a firearm ... to be imported or brought into the United States ... if the firearm ... (3) is of a type that does not fall within the definition of a firearm as defined in section 5845(a) of the Internal Revenue Code of 1954 and is generally recognized as particularly suitable for or readily adaptable to sporting purposes, excluding surplus military firearms...

The rifles in question here meet both tests in that they are generally recognized as particularly suitable for and readily adaptable to sporting purposes. The rifles are not military rifles, are not used by any military force, and would not even be considered for use by any military force. The rifles have no use other than for sporting purposes, particularly target shooting (competitive and practice) and hunting.

The ability to accept a large capacity military magazine is also the ability to accept a small capacity non-military magazine. A rifle with this feature is obviously readily adaptable to sporting purposes even as narrowly defined in the Study. Further, Congress clarified the matter in the Public Safety and Recreational Firearms Use Protection Act of 1994. Among the "recreational firearms" excluded from the assault weapon category are the Iver Johnson M-1 Carbine and the Iver Johnson 50th Anniversary M-1 Carbine. 18 U.S.C. 922(v)(3) and Appendix A. It is noteworthy that all of the rifles at issue which fire 7.62 NATO, 7.62x39, and 5.56 mm cartridges are more accurate and fire at greater ranges than the M-1 carbine.

It is an error to conclude that the rifles imported by Dominion Import Group, Ltd., specifically the SLR-95, SLR-97, ROMAK-1 and ROMAK-2, are not generally recognized as particularly suitable for or readily adaptable to sporting purposes. All of these rifles were designed and manufactured to permit only semiautomatic fire. The rifles have no provision for conversion to permit automatic fire. The rifles are not equipped with bayonets, bayonet mounts, large capacity magazines, threaded muzzles, or other features commonly associated with non-sporting weapons. Moreover, these rifles are used by many sport shooters throughout the country for hunting and target shooting.

As you know from previous correspondence, Dominion Import Group, Ltd. had a total of 1,900 ROMAK-1 and ROMAK-2 rifles in the U.S. and in transit to the U.S. at the time of the temporary suspension of import permits in November, 1997. The 1,900 rifles were properly and legally brought to the U.S. pursuant to Import Permit No. 97-06265, which was issued by the BATF Firearms and Explosives Imports Branch on July 9, 1997. Half of the rifles arrived in the U.S. on November 14, 1997, and half arrived November 18, 1997. Dominion Import Group, Ltd. was notified by BATF via phone and fax of the temporary suspension on November 17, 1997.

It was inherently unfair to suspend Dominion Import Group, Ltd.'s import permit for shipments which had arrived in the U.S. or which were in transit to the U.S. pursuant to a valid import permit without any advance notice or grace period to clear these shipments. The shipments have sat idle for nearly 6 months to the financial detriment of Dominion Import Group, Ltd., and are currently being held under U.S. Customs Bond No. 6747151 and Bond No. 6747152.

Based on the above, Dominion Import Group, Ltd. respectfully requests that you reverse your initial determination regarding these permits and approve Dominion Import Group, Ltd.'s permits for the rifles it imports. Also, in the interests of justice and fair play, Dominion Import Group, Ltd. respectfully request that the ROMAK-1 AND ROMAK-2 Rifles currently being held under U.S. Customs Bond No. 6747151 and Bond No. 6747152 be released immediately. Please contact us if you need any further information.

Very Truly Yours,


Robert J. Roskovich
President



Law Offices of
Robert E. Sanders
P.O. Box 511535
Punta Gorda, FL 33951-1535

telephone (941-575-2114
facsimile (841) 575-6625

May 4, 1998

**BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

John W. Magaw, Director
Bureau of Alcohol, Tobacco and Firearms
U.S. Department of the Treasury
650 Massachusetts Avenue, N.W.
Washington, D.C. 20226

RE: THE REVOCATION OF IMPORT PERMITS
D.S. Arms, Incorporated, Grayslake, Illinois

Dear Director Magaw:

I write as the attorney for D.S. Arms, Incorporated to appeal the decision to deny or revoke the above listed import permits as the rifles in question do meet the sporting criteria set forth in the Gun Control Act of 1968, 18 U.S.C. 925(d). As grounds for this appeal, we assert that the Department of the Treasury Study on the Sporting Suitability of Modified Semiautomatic Assault Rifles (April 1998) is based on legal errors and factual inaccuracies.

D.S. Arms, Inc. hereby incorporates by reference all records and evidence of every kind and in every form known to the Department of the Treasury when it determined that the subject rifles or types of rifles did meet the sporting test, as well as when Treasury determined that it did not meet the test. These records and evidence thereby include all material which was considered by Treasury when it first determined that such rifle types did meet the sporting test; when Treasury first determined during or after the Bureau of Alcohol, Tobacco and Firearms 1989 Study that determined that the specific subject rifles and types of rifles met the sporting test, and all other records and evidence available to the Department of the Treasury through the present. These records and evidence include not only submissions by D.S. Arms, Inc. but also submissions in whatever form by all interested persons and entities for the entire period from 1968 to the present.

18 U.S.C. 925(d) provides in pertinent part:

May 4, 1998

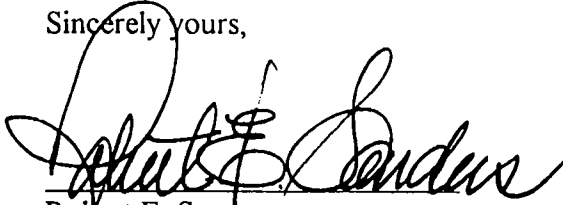
"The Secretary *shall* authorize a firearm ... to be imported or brought into the United States ... if the firearm ... (3) is of a type that does not fall within the definition of a firearm as defined in section 5845(a) of the Internal Revenue Code of 1954 and is generally recognized as particularly suitable for or readily adaptable to sporting purposes, excluding surplus military firearms ..."

The rifles in question here meet both tests in that they are generally recognized as particularly suitable for, and readily adaptable for, sporting purposes. The rifles are not military rifles and not used by any military force, and would not even be considered for use by any military force. The rifles have no use other than for sporting purposes, particularly target shooting (competitive and practice) and hunting.

The ability to accept a large capacity magazine is also the ability to accept a small capacity non-military magazine. A rifle with this feature is obviously readily adaptable to sporting purposes even as narrowly defined in the Study. Further, Congress clarified the matter in the Public Safety and Recreational Firearms Use Protection Act of 1994. Among the "recreational firearms" excluded from the assault weapon category are the Johnson M-1 Carbine and the Johnson 50th Anniversary M-1 Carbine. See 18 U.S.C. 922(v)(3) and Appendix A. It is noteworthy that all the rifles at issue which fire 7.62 NATO 7.62 x 39 and 5.56 mm cartridges are more accurate and fire at greater ranges than the M-1 Carbine.

Based on the above and for all other reasons known to you, D.S. Arms, Inc. respectfully requests that you reverse your initial determination regarding these permits and approve D.S. Arms, Inc.'s imports for the rifles in question.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Robert E. Sanders", written over a horizontal line.

Robert E. Sanders

RES/ag

Enclosure: none

MAY 11 1998



OF AMERICA LP.

3904-B Sardis Curch Rd, Monroe, NC 28110
Phone (704) 821 83 37, Fax (704) 821 85 23
e-mail: interordnanceofamericaLP@msn.com

John W. Magaw
Director
Bureau of Alcohol, Tobacco and Firearms
U.S. Departement of the Treasury
650 Massachusetts Ave. N.W.
Washington, D.C. 20226

Date: 4-29-98

RE: The revocation of Import permits: 97-00775
97-02675
97-07451

Dear Director Magaw:

In response to your letter of April 8th 1998, Inter Ordnance of America L.P. does hereby appeal the decision to deny or revoke the above listed permits as the rifles in question do meet sporting criteria set out in the gun control act of 1968, 18 U.S.C. # 925 (d). We believe that the Department of the Treasury Study on the Sporting Suitability of Modified Semiautomatic Assault Rifles (April 1998) is based on the legal errors and factual inaccuracies.

We hereby incorporate by reference all records and evidence of every kind whatever known to the Department of the Treasury when it determined that the subject rifles or types of rifles did meet the sporting test, as well as when it determined that they did not meet the test. These records and evidence thereby include that which was before Treasury in 1968 when it first determined that such rifle types meet the sporting test, when it first determined during or after your 1989 study that the specific subject rifles and types of rifles meeting the sporting test, and all other records and evidence available to the Department through the present. These records and evidence include not only submissions by this firm but also submissions by all interested persons and entities whatever for the entire period of 1968 to the present.

18 U.S.C. # 925 (d) provides in parts:

The Secretary shall authorize a firearm... to be imported or brought into the U.S... if the firearms... (3) is of a type that does not fall within the definition of a firearm as defined in section 5845(a) of the Internal Revenue Code of 1954 and is generally recognized as particularly suitable for or readily adaptable to sporting purposes, excluding surplus military firearms...

The rifles in question here meet both test in that they are generally recognized as particularly suitable for and readily adaptable to sporting purposes.

The rifles are not military rifles, are not used by any military force, and would not even be considered for use by any military force. The rifles have no use other than for sporting purposes, particularly target shooting (competitive and practice) and hunting.

The ability to accept a large capacity military magazine is also the ability to accept a small capacity non military magazine.

A rifle with this feature is obviously readily adaptable to sporting purposes even as narrowly defined in the study. Further Congress clarifies the matter in the Public Safety and Recreational Firearms Use Protection Action of 1994.

Among "Recreational Firearms" Exclude from the assault weapon category are the Iver Johnson M-1 carbine and the Iver Johnson 50th Anniversary m-1 carbine. 18 U.P.C. 922(v) (3) and appendix A. It is noteworthy that all the rifles at issue which fire 7.62 NATO, 7.62 x 39, and 5.56 mm cartridges are more accurate and fire at greater ranges than the M-1 carbine.

We have discussed this matter in our letter to you of the 12-25-1997 and a more detailed study was given by the NRA to you. We think that this new study initiated by this administration, is just political and hurts the rights of the citizens of the USA. In addition to this we as an importer has followed all guidelines and rules for importation which were set by Mr. Clinton and the ATF. It is not fair to revoke approved permits and put the merchandise, which was on the water into customs bond without any prior governmental statement or warning. We have relied on the basis of our approved import permits and have invested a large amount of money, which is now tied up since November 14th 1997. It would be only fair, to relief the merchandise which is under the customs bond in order not to do any more harm to the importers who are effected by the study.

Based on the above Inter Ordinance of America LP. Respectfully requests that you reverse your initial determination regarding these permits and approve Inter Ordinance`s import permits for the rifles in question.

We appreciate your cooperation and hope that we will continue our good cooperation. Please contact us if you need any further information.

Sincerely, Yours


Ulrich H Wiegand
President

250223 022
MAY 1 1998



**INTER
ORDNANCE**

OF AMERICA LP.

3904-B Sardis Church Rd, Monroe, NC 28110
Phone (704) 821 83 37, Fax (704) 821 85 23
e-mail: interordnanceofamericalp@msn.com

John W. Magaw
Director
Attention Mr. Lawrence G. White
Bureau of Alcohol, Tobacco and Firearms
U.S. Department of the Treasury
650 Massachusetts Ave. N.W.
Washington, D.C. 20226

Date: 5-8-98

*RE: The revocation of Import permits: 97-00775
97-02675
97-07451*

Dear Mr. White,

This letter is in reference to our letter of April 29th 1998. I have to ad the permit number 97-08687 for SLG 95 receivers to the a.m. permits. We do have 100 receivers under customs bond and appeal the revocation of the approved import permits.

Please ad this letter to our appeal of April 29th.

We appreciate your cooperation and hope that we will continue our good cooperation. Please contact us if you need any further information.

Sincerely, Yours


Ulrich H Wiegand
President

AD(FEA)

INTERPORT Inc.



DELTA, UTAH 84624-0800 U.S.A.

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JOHN W. MAGAW

Director,

B of ATF

Washington, DC 20226

Ref: Permit #97-02887

May 14th, 1998

RECEIVED
MAY 18 10 33 AM '98
DIRECTOR, BUREAU OF
ALCOHOL, TOBACCO &
FIREARMS

Response to ATF letters and exhibit - generally also to all other previously approved or pending import permits for certain "sporting" firearms.

Dear Mr. Magaw,

As you might expect our company does "disagree with the proposed action" as contained in your April 8th letters to us. The "AK" type semi-auto rifle, and/or it's barreled action, and/or receiver only that we have sought for importation by way of import permit from your bureau has been tossed around with you folks for over a decade. We have submitted actual samples of certain non machinegun type AK rifles to your agency for test and evaluation as to your agencies determination of the particular firearm being able to pass your non nondescript sporting test pursuant to 925d3. (see our several letters of last year to you on the fixed ascertainable standard question of your "sporting test"). Over the last decade we have had your agency determine (after actual hands on examination) that a non machinegun "AK" rifle **did** past the laws test for being suitable for importation as being a "sport" firearm. Then a short time latter your agency vetoed itself and said the very same rifle does not now meet the standards of 925d3. Latter we made changes to the cosmetics of the rifle and it was resubmitted to your agency for additional hands on test and evaluation. Approval by your agency was again given for importation of the modified AK rifle under the provisions of 925d3. Now again your agency vetoes itself and tells us that the non militia AK rifle for which you issued us a import permit for is no longer legally importable for commercial resale to the law abiding citizens of the United States. You send us a 1" thick report (penned by who knows who) that attempts to explain the logic and philosophy of your agency and the U.S.

Government on this matter. However, after our recent taking of deposition of your acting Firearms Technology Branch Chief (Kurt Bartlett) we found out just how untrained & unqualified to judge firearms and the law your ATF employees really are.

As to your recent letter and report - On the one hand you state that "the LCMM rifles may be used or even are sometimes used for hunting and organized competitive target shooting; if this were the standard, the statute (925d3) would be meaningless. Well sir the statute is meaningless - You agency has proved that by your continue arbitrary administration of a "unconstitutional on its face" Federal statute. Unconstitutional by the fact that the Second Amendment simply states that militia firearms BY LAW would not be prohibited to it's citizens by the Federal government (any of it's agencies). 925d3 in plain English language does exactly that. Then because neither Congress or your agency has ever publicly published for the common citizen a fixed ascertainable standard (definition) of what is a **lawful** "sporting purpose test" the B of ATF has bounced the firearms industry all across the court in order to placate whatever political transient might be in the White House at any given time. Of course none of your actions on the import law in question have had anything to do with "combating the increasing prevalence of crime in the United States". To our view what your agency is doing is crime - crime against the Constitution and stated rights of the citizens of this the U.S. and a violation of your oath of Federal public employment to uphold the Constitution of our country against all enemies - both foreign and domestic. The actions of your agency in relation to this matter have cost our company and the firearms industry on the whole millions of dollars in lost sales and legal expenses - and all to what end - to appease that charlatan at 1600 and his anti-American curmudgeons. As we mentioned before your and your posterity's personal (civil) rights are going up in the same smoke you are creating to destroy our civil rights by your position in this matter.

Academically we will say that your "Military Configuration" (exhibit 5) has some flaws.

BAYONET - Could your people not come up with any "traditional sporting use" for a knife (bayonet) such as cleaning fish, cutting limbs for a shelter (sawback), skinning a game animal, mending a fence (wirecutter)?

FLASH HIDER - I know of no military "flash hider" that conceals the shooter's position - day or night. In most cases the device should be called a flash splitter. In low light the flash is split into sections so the shooter is not totally blinded by the fire ball visible during low light shooting. Since the U.S. government has never determined a fixed ascertainable definition of sporting then who in your agency is qualified to determine any particular benefit of a "flash splitter" on any traditional "sporting" firearms. We challenge your agency to prove that the removal of the

device you call a flash hider from any military weapon would have an adverse impact on accuracy.

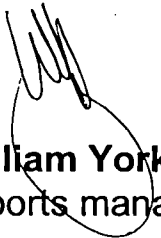
BIPODS - We challenge your agency to prove the truth of the statement that "The **majority** of military firearms have bipods as an integral part of the firearm or contain specific mounting points to which bipods may be attached".

GRENADA LAUNCHER - Again we challenge your agency to prove the truth of the statement that "Grenade launchers are incorporated in the **majority** of military firearms...".

NIGHT SIGHTS - Again we challenge your agency to prove the truth of the statement under this heading.

We herein incorporate with this letter our letters addressed to you during 1997 concerning the subject of this whole matter of "sporting" and 925d3. We also reserve the right to amend our response and add additional information as it becomes available to us. We believe your study and your subsequent decision is based on legal errors and factual inaccuracies. We believe that all the firearms we held permits for, or were pending were generally recognized as particularly suitable for, and/or readily adaptable to sporting purposes as that term is generally recognized by the American firearms owner, shooter, and collector. We also incorporate into this response all other industry member & general public comment letters that favor our position in this matter and that are in opposition to your agencies positions.

Sincerely,

A handwritten signature in black ink, appearing to read 'William York', is written over a circular stamp or seal.

William York
imports manager



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, DC 20226

APR 8 1998

DIRECTOR

F:SD:FEI:EO
5330

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Interport Inc.
700 N. 200 W.
Delta, UT 84624

Gentlemen:

By letter dated November 14, 1997, you were advised that the Bureau of Alcohol, Tobacco and Firearms has suspended your import permits to import certain semiautomatic rifles while the Department of the Treasury conducted a study to determine whether these firearms meet the requirements for importation under the Gun Control Act of 1968, as amended.

Treasury has completed its study and has determined that the semiautomatic rifles do not meet the statutory requirements for importation. Specifically, 18 U.S.C. § 925(d)(3), provides in pertinent part that:

The Secretary shall authorize a firearm . . . to be imported or brought into the United States . . . if the firearm...

(3) is of a type that . . . is generally recognized as particularly suitable for or readily adaptable to sporting purposes, excluding surplus military firearms. . .

Treasury has determined that modified semiautomatic assault-type rifles such as those you propose to import do not qualify for importation under the statute, and that the permits issued to import these rifles should be revoked. The basis for this determination is set forth in detail in the enclosed Study on the Sporting Suitability of Modified Semiautomatic Assault Rifles.

Interport Inc.

Accordingly, your permit(s) to import the following model(s) of firearms on the permit number(s) indicated below has/have been proposed for revocation.

Firearm Model

Permit Number

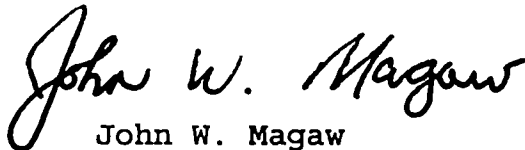
AK 47 type
Mfd. By Cugir

97-02887

This notice does not constitute a final decision. If you disagree with the proposed action, please submit your written comments and any relevant materials within 30 days of receipt of this letter. Any materials submitted by you will be carefully considered in making a final decision. If you elect not to provide any written comments or additional material within that period, we will issue a final decision based on the information already available to the Bureau. In either case, you will be notified promptly of the final decision in this matter.

Should you have any questions concerning this action or your opportunity for input into the decision, please contact Lawrence G. White, Chief, Firearms and Explosives Imports branch, at (202) 927-8320.

Sincerely yours,



John W. Magaw
Director

Enclosure

INTERPORT Inc.



DELTA, UTAH 84624-0800 U.S.A.

☎ (435) 864-2185 📠 FAX 864-2197

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Importer - Exporter - Manufacture

Civilian and Military Small Arms, Spare Parts & Ammunition

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Dec 17th, 1997

To: Mr. John W. Magaw

Director - B of ATF

and all other public employees of the U.S. citizenry from Prince Bill on up
Washington, DC 20226

Pursuant to the ATF's multiple invites for our comment (opinion) on the most recent Clinton inspired suspension of our import permits for certain semi-automatic rifles and their component receivers while yet another "review" is conducted by the U.S. Government as to the "sporting purpose test" of our semi-auto firearms and their importability under 18 USC 925 (d)(3) - which additional "review" has been brought about **after** each of the weapons, for which we had Import Permits, had already been individually submitted to ATF Tech Branch for hands-on testing and evaluation AND HAD BEEN APPROVED FOR IMPORT BY THE UNITED STATES GOVERNMENT (ATF TECH BRANCH) AFTER BEING FOUND TO BE LEGALLY SUITABLE FOR SAID **SPORTING PURPOSES** PURSUANT TO 925d3 ! - Let us say that our opinion of your system of administration of 925d3 of the Federal "gun laws" is nothing but a sham upon the American public and the firearm industry members - and you know it is a sham! Our proof of this statement is as follows:

We had made repeated inquiry (4 letters) earlier this year to try and pin you (the United States Government) down as to what ascertainable legal standards you were using to determine the importability of **rifle** firearms under 18 USC 925 (d)(3). Your eventual response was that **"neither the law (Congress) nor the implementing regulations (ATF) further define the SPORTING PURPOSES test of the statute"**. "Further define" should have been written as "HAVE EVER DEFINED".

Common sense would then dictate that since neither Congress, nor ATF, have a fixed definition of "sporting purposes" all reviews, examinations, determinations, studies, etc. pursuant to 925d3 by Government employees are ludicrous, a sham, of no legal validity, and the resulting restrictive infringements of import, sales, and ownership of

the effected rifles by way of said Governmental actions only exacerbate the continually widening chasm between

1. the law abiding American public, the firearms industry, our company, and
2. the U.S. Government institutes, their employees, and the extended want-a-be governing agencies of American citizens such as the UN, CFR, and Trilaterist organizations.

Any fool knows that the only **true** mechanical function or purpose of a firearm is to **reliably process ammunition***, and those firearms that fire (hold) more than one shot (either manually, semi or full auto) **require a ammunition feed mechanism**. The firearm manufactures chosen mechanical or cosmetic design of the firearm beyond the just mentioned two requirements is for all other purposes inconsequential and then only a matter of personal preference, or the marketing ability of the vendors. All efforts by any governmental bureaucracy to "legislate" the lawful use of firearms by cosmetic or mechanical design restrictions only reflect on the persons attempting such fiasco as being labeled (and truly so) as asinine ne'er-do-wells. In addition all such seemingly well meaning governmental efforts, as here-to-fore mentioned, not only fly in the face of the citizens rights as simply stated in the 2nd amendment of our Constitution, but more importantly totally degrade the memory of those brave and lesser souls that have paid willingly (and not) with life and limb to preserve the concepts, beliefs, and freemans lifestyle contained in that sacred document that is enshrined in our Nations capitol. All government employees with the disposition to be proud to be involved in the administration of "good government" should have the guts to send a comment to King Bill (and his Queen), Feinstein, Schumer, and all their ilk - tell them to get screwed! After all - It's your country and rights too!

Signed,

A handwritten signature in black ink, appearing to read 'William York', enclosed within a large, loopy, handwritten oval or circle.

William York
mgr.

*The style of operation of the firearm, or target the ammunition is processed at has no political connection to the simple mechanical function of the firearm.



INTERPORT INC.

P. O. BOX 800 (700 N. 200 W.)

DELTA, UTAH 84624 U.S.A.

☎ (801) 864-2185

☎ FAX (801) 864-2197

Importers of

Weapons & Spare Parts

Mar. 24th, 1997

Attn: Mr. John W. Magaw

Director

B of ATF

Washington, DC 20226

In your open letter to all Federal Firearms Importers dated Apr 20 1994 (copy attached) you mentioned that under 18 U.S.C. 925(d)(3) "the Secretary of the Treasury shall authorize a firearm to be imported if the firearm is generally recognized as particularly suitable for....sporting purposes".

As to the importation of **rifles** - Please provide us a copy of the ascertainable standards your agency uses to determine the approval or disapproval of importation of these firearms under 18 U.S.C. 925(d)(3).

Sincerely,

William York imports manager



DIRECTOR

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, D.C. 20226

APR 20 1994

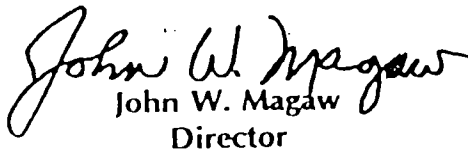
OPEN LETTER TO ALL FEDERAL FIREARMS IMPORTERS

The Bureau of Alcohol, Tobacco and Firearms (ATF) is responsible for enforcing the Federal laws and implementing regulations relating to the importation of firearms, ammunition and implements of war. This process is accomplished by enforcement of the Gun Control Act of 1968 (GCA), the Arms Export Control Act of 1976 (AECA) and the National Firearms Act (NFA).

The ATF Firearms and Explosives Imports Branch is responsible for acting on all permit applications and reviewing import documents to ensure that only authorized articles are imported.

Under 18 U.S.C. 925(d)(3), the Secretary of the Treasury shall authorize a firearm to be imported into the United States if the firearm is generally recognized as particularly suitable for, or readily adaptable to, sporting purposes, excluding surplus military firearms. If the firearms are classified as National Firearms Act weapons (NFA), they can only be imported into the United States for government entities and law enforcement agencies. It is the responsibility of the Federal firearms licensee to ensure that only articles authorized on the approved Form 6 permit application are imported and that imported articles are properly marked in accordance with 27 CFR Part 178.92. Items that are found to be imported in violation of the GCA, NFA, or AECA are subject to seizure and forfeiture and these violations could also result in criminal prosecution and the revocation of your Federal Firearms License.

If you have any questions concerning this matter, contact the Firearms and Explosives Imports Branch at (202) 927-8320.


John W. Magaw
Director



INTERPORT Inc.

Importers, Exporters, Manufactures

P. O. Box 800 (700 N. 200 W.)

of NFA Weapons & Spare Parts

DELTA, UTAH 84624-0800 U.S.A.

☎ (801) 864-2185

☎ FAX (801) 864-2197

Apr. 9th, 1997

Attn: Mr. John W. Magaw

Director

B of ATF

Washington, DC 20226

Please respond to our March 24th letter - copy attached.

Thanks,

William York imports manager

SECOND REQUEST!



INTERPORT Inc.

Importers, Exporters, Manufactures

P. O. Box 800 (700 N. 200 W.)

of NFA Weapons & Spare Parts

DELTA, UTAH 84624-0800 U.S.A.

☎ (801) 864-2185

☎ FAX (801) 864-2197

Apr. 23rd, 1997

Attn: Mr. John W. Magaw

Director

B of ATF

Washington, DC 20226

Please respond to our March 24th letter (and Apr 9th) - copy attached.
We need this information immediately!

Thanks,

William York imports manager

THIRD REQUEST!

**INTERPORT Inc.***Importers, Exporters, Manufacturers***P. O. Box 800 (700 N. 200 W.)****of NFA Weapons & Spare Parts****DELTA, UTAH 84624-0800 U.S.A.****☎ (801) 864-2185****☎ FAX (801) 864-2197**

Apr. 23rd, 1997

Attn: Mr. John W. Magaw
Director
B of ATF
Washington, DC 20226

Please respond to our March 24th letter (and Apr 9th) - copy attached.
We need this information immediately!

Thanks,

William York imports manager

THIRD REQUEST!

WE CONTINUE RECEIPT OF THIS INQUIRY AND ANTICIPATE A
RESPONSE THE WEEK OF MAY 12-16, 1997.

FIREARMS AND EXPLOSIVES IMPORTS BRANCH 202/422-8320



INTERPORT Inc.

P. O. Box 800 (700 N. 200 W.)

DELTA, UTAH 84624-0800 U.S.A.

☎ (801) 864-2185

Importers - Exporters -

Manufactures of NFA

Weapons & Spare Parts

☎ FAX (801) 864-2197

June 9th, 1997

Attn: Mr. John W. Magaw

Director

B of ATF

Washington, DC 20226

As a licensed importer-manufacture our company has made 3 inquiries since Mar 24 to which we received one fax on May 9th promising a response the week of May 12-16, 1997 (copies attached). To date we have received nothing in the mail. We can now only assume that the ATF has no written or established "ascertainable standards your agency uses to determine the approval or disapproval of importation of these firearms (rifles) under 18 U.S.C. 925(d)(3).

If we are mistaken in our assumption then please so advise in writing within - let's say - 10 days. Otherwise, in light of the treatment of our multiple written requests, we will have to proceed in our business with the assumed knowledge we have so indicated.

All the best,

William York imports manager



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, DC 20226

JUL - 2 1997

E:RE:FI:BSM
5330/York
Re: standards

William York
Imports Manager
Interport, Inc.
P.O. Box 800
Delta, UT 84624

Dear Mr. York:

This is in response to your letter dated March 24, 1997, in which you asked for a copy of the ascertainable standards that the Bureau of Alcohol, Tobacco and Firearms uses to determine the importability of rifles under 18 U.S.C. 925(d)(3), the Gun Control Act of 1968 (GCA).

Section 925(d)(3), Title 18, U.S.C., prohibits the importation of firearms that are not "generally recognized as particularly suitable for or readily adaptable to sporting purposes." Neither the law nor the implementing regulations further define the "sporting purposes" test of the statute. ATF I 5330.17 is enclosed as a source of background information for your reference.

In determining whether a particular firearm is suitable for sporting purposes within the meaning of the statute, ATF generally relies upon an analysis of the physical features of the weapon. Since 1968, ATF has relied upon factoring criteria to determine whether handguns meet the sporting purposes test for importation. The criteria, set forth in ATF Form 4590, evaluate physical characteristics of handguns such as overall length, caliber, weight, safety features, and frame construction. A copy of the form is enclosed for your information.

One reported court case has endorsed ATF's interpretation of the statute as requiring that imported shotguns have physical characteristics indicating that they are suitable for sporting purposes. In Gilbert Equipment Co., Inc. v. Higgins, 709 F.Supp. 1071 (S.D. Ala.1989), aff'd without opinion, 894 F.2d 412 (11th Cir. 1990), the court upheld ATF's denial of an application to import the USAS-12 shotgun. In evaluating the shotgun for importation, ATF determined that the weight, bulk, designed magazine capacity, military features, and overall appearance of the weapon indicated that it was not suitable for sporting purposes.

Mr. William York

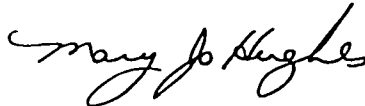
In 1989 ATF relied upon the sporting purposes standard of section 925(d)(3) in suspending the importation of semiautomatic assault rifles. In evaluating the weapons suspended, ATF determined that the semiautomatic rifles in question were a distinctive type of firearm identified by physical features and characteristics designed for military applications that distinguish them from traditional sporting rifles. Those features and characteristics are as follows:

1. Military Configuration: Ability to accept a detachable magazine; folding/telescoping stocks; pistol grips; ability to accept a bayonet; flash suppressor; bipods; grenade launcher; night sights.
2. Semiautomatic version of a machinegun.
3. Rifles chambered to accept a centerfire cartridge case having a length of 2.25 inches or less.

Report and Recommendation of the ATF Working Group on the Importability of Certain Semiautomatic Rifles, Bureau of Alcohol, Tobacco and Firearms, Washington, DC, July 6, 1989.

The Firearms Technology Branch routinely examines firearms to determine whether they are suitable for sporting purposes for purposes of importation. Weapons may be conditionally imported to make such a determination. Should you desire such an evaluation for a particular weapon, please contact the Firearms Technology Branch.

Sincerely,



Mary Jo Hughes
Chief, Firearms and Explosives Imports Branch

Enclosures



INTRAC ARMS INTERNATIONAL L.L.C.

United States
Headquarters: 5005 Chapman Highway
Knoxville, Tennessee 37920
Phone: (423) 573-0065
Fax: (423) 579-0937

European
Operations:

Schlossgasse 12
A-2540 Bad Vöslau, Austria
Phone: 43-2252-77764
Fax: 43-2252-78897

BY CERTIFIED MAIL RETURN RECEIPT REQUESTED

John W. Magaw
Director
Bureau of Alcohol, Tobacco and Firearms
U.S. Department of the Treasury
650 Massachusetts Avenue N.W.
Washington, D.C. 20226

RECEIVED
MAY 12 2 26 PM '98
DIRECTOR, BUREAU OF
ALCOHOL, TOBACCO &
FIREARMS

RE: The revocation of import permits 97-00943, 97-01307, 97-02277, 97-02278, 97-02282, 97-02724, 97-03226.

Dear Director Magaw:

In response to your letter of April 9, 1998, Intrac Arms International, L.L.C. does hereby appeal the decision to deny or revoke the above listed import permits as the rifles in question do meet the sporting criteria set out in the Gun Control Act of 1968, 18 U.S.C. §925(d). We believe that the Department of the Treasury Study on the Sporting Suitability of Modified Semiautomatic Assault Rifles (April 1998) is based on legal errors and factual inaccuracies.

We hereby incorporate by reference all records and evidence of every kind whatever known to the Department of the Treasury when it determined that the subject rifles or types of rifles did meet the sporting test, as well as when it determined that they did not meet the test. These records and evidence thereby include that which was before Treasury in 1968 when it first determined that such rifle types met the sporting test, when it first determined during or after your 1989 study that the specific subject rifles and types of rifles met the sporting test, and all other records and evidence available to the Department through the present. These records and evidence include not only submissions by this firm but also submissions by all interested persons and entities whatever for the entire period of 1968 to the present.

18 U.S.C. § 925(d) provides in part:

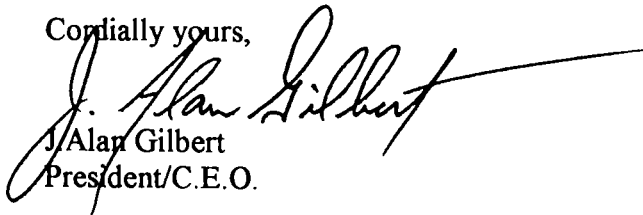
The Secretary shall authorize a firearm... to be imported or brought into the United States... if the firearm.... (3) is of a type that does not fall within the Definition of a firearm as defined in section 5845(a) of the Internal Revenue Code of 1954 and is generally recognized as particularly suitable for or readily Adaptable to sporting purposes, excluding surplus military firearms...

The rifles in question here meet both tests in that they are generally recognized as particularly suitable for and readily adaptable to sporting purposes. The rifles are not military rifles, are not used by any military force, and would not even be considered for use by any military force. The rifles have no use other than for sporting purposes, particularly target shooting (competitive and practice) and hunting.

The ability to accept a large capacity military magazine is also the ability to accept a small capacity non-military magazine. A rifle with this feature is obviously readily adaptable to sporting purposes even as narrowly defined in the Study. Further, Congress clarified the matter in the Public Safety and Recreational Firearms Use Protection Act of 1994. Among the "recreational firearms" excluded from the assault weapon category are the Iver Johnson M-1 Carbine and Iver Johnson 50th Anniversary M-1 Carbine. 18 U.S.C. 922(v)(3) and Appendix A. It is noteworthy that all of the rifles at issue which fire 7.62 NATO, 7.62x39, and 5.56 mm cartridges are more accurate and fire at greater ranges than the M-1 carbine.

Based on the above, Intrac Arms International, L.L.C respectfully requests that you reverse your initial determination regarding these permits and approve Intrac Arms International, L.L.C.'s import permits for the rifles in question. Please contact us if you need any further information.

Cordially yours,


J. Alan Gilbert
President/C.E.O.

Kalashnikov - USA - Ltd.

1445 S.E. Village Green Drive • Suite 1-A

Port St. Lucie, FL, USA 34952

Tele. 561-337-3398

kalashnikov-saiga@msn.com

Fax 561-337-0999

RECEIVED
MAY 04 1998

To: Mr. John W. Magaw
Director BATF

April 23, 1998

Fm: Stevens Lyshon
Falcon Trade&Transport Inc.
(DBA) Kalashnikov-USA

Dear Sir,

I am in receipt of your letter dated 4/8/98 which suspended our import permit #97-00627 for the Saiga Carbine 7.62x39. I am also in receipt of your Study on the Sporting Suitability of Modified Semiautomatic Assault Rifles. April 1998 I have carefully read your study and I believe I understand the criteria upon which you based your decisions on which rifles can or cannot be imported. The Saiga Carbine, as you are aware of, is a carbine or rifle that uses the receiver and some of the parts of the standard Russian AK. The Izhmash JSC of Izhevsk, Russia is the original manufacturer of the Russian AK and Mr. Mikhail Kalashnikov is still an advisor at the factory. To meet the qualifications of importing into the United States and to make a moderate priced semi-automatic hunting rifle the designers used the AK frame and parts but modified the detachable magazine to only load from the 5 round magazine provided with the rifle. Although the standard large capacity magazine will fit in the receiver it will not load the chamber because of this modification. They also changed the position of the trigger housing so you cannot fit a pistol grip on this rifle and the stock and forend are standard hunting type stocks. Of the eight features you use as a guide to determine and assault weapon the only one the "Saiga" has is the detachable magazine, explained above, and number 8 in the list is any rifle will accept this type of scope.

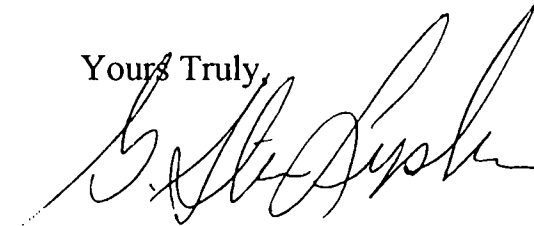
This rifle is a fine rifle for medium game hunting and with the availability of obtaining inexpensive ammunition, it is a rifle the average man can afford to shoot. I have sent a sample rifle to the Technical Branch of the BATF for further evaluation as I understand the VEPR rifle is still being evaluated and is very close to the "Saiga".

The General Director, Mr. Vladimir Grodetsky, of Izhmash JSC and the Director of the Arms Factory Mr. Georgi Shumkov of Izhmash JSC, which is the largest manufacturing facility in The Russian Federation, are planing a visit to the United States in the near future and would welcome and opportunity to meet with you and representatives of the BATF and discuss the future of Russian sporting and hunting arms in the U.S.

Izhmash JSC does not want to be looked on as a manufacturer of "Assault" weapons, even though they do manufacture military weapons, in fact the US Army is interested in evaluating several of their weapons for future consideration, but Izhmash JSC through "Kalashnikov-USA-Ltd. would like to establish a reputation as the producer of world class target rifles and hunting and sporting rifles.

I thank you for your consideration in this matter as it is very important to the future of the Izhmash JSC factory, which is struggling to enter the U.S. market with acceptable products and any input you or the BATF could give us on these matters would be very helpful. Kalashnikov-USA-Ltd. is a joint venture sales company formed to represent the many products that Izhmash JSC produces from automobiles, trucks, motorcycles, industrial machinery and medical equipment and of course various arms.

Yours Truly,

A handwritten signature in dark ink, appearing to read "Stevens Lyshon", written over a horizontal line.

Stevens Lyshon
Managing Director
Kalashnikov-USA-Ltd.

gsl/gld



P.O. Box 6625 • Harrisburg, PA 17112

MAY 05 1998

MAY 05 1998

April 28, 1998

John W. Magaw
Director
Bureau of Alcohol, Tobacco and Firearms
U.S. Department of the Treasury
650 Massachusetts Avenue, N.W.
Washington, D.C. 20226

RE: The revocation of import permits 97-00118, 97-02997, 97-04609 and 97-04610.

Dear Director Magaw:

In response to your letter of April 8, 1998 K.B.I., Inc. does hereby appeal the decision to deny or revoke the above listed import permits as the rifles in question do meet the sporting criteria set out in the Gun Control Act of 1968, 18 U.S.C. § 925(d). We believe that the Department of the Treasury Study on the Sporting Suitability of Modified Semiautomatic Assault Rifles (April 1998) is based on legal errors and factual inaccuracies.

We hereby incorporate by reference all records and evidence of every kind whatever known to the Department of the Treasury when it determined that the subject rifles or types of rifles did meet the sporting test, as well as when it determined that they did not meet the test. These records and evidence thereby include that which was before Treasury in 1968 when it first determined that such rifle types met the sporting test, when it first determined during or after your 1989 study that the specific subject rifles and types of rifles met the sporting test, and all other records and evidence available to the Department through the present. These records and evidence include not only submissions by this firm but also submissions by all interested persons and entities whatever for the entire period of 1968 to the present.

On December 10, 1991 and again on October 14, 1994, the Bureau of Alcohol, Tobacco and Firearms notified our company that our SA-85M rifle "... is not a semi-automatic assault rifle as defined. The SA-85M rifle is also suitable for importation under the provisions of 18 U.S.C. § 925 (d) (3)." We do not understand how on two separate occasions ATF has classified this rifle as a sporting firearm and now has determined that it is no longer a sporting firearm. Enclosed, please find copies of your correspondence of December 10, 1991 and October 14, 1994.

18 U.S.C. § 925(d) provides in part:

The Secretary shall authorize a firearm ... to be imported or brought into the United States ... if the firearm ... (3) is of a type that does not fall within the definition of a firearm as defined in section 5845(a) of the Internal Revenue Code of 1954 and is generally recognized as particularly suitable for or readily adaptable to sporting purposes, excluding surplus military firearms ...

Bureau Alcohol, Tobacco & Firearms
John W. Magaw
Director
April 28, 1998
Page 2

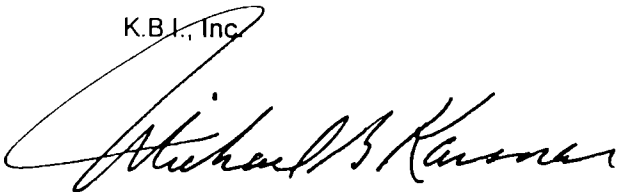
The rifles in question here meet both tests in that they are generally recognized as particularly suitable for and readily adaptable to sporting purposes, as you previously confirmed on two occasions. The rifles are not military rifles, are not used by any military force, and would not even be considered for use by any military force. The rifles have no use other than for sporting purposes, particularly target shooting (competitive and practice) and hunting.

The ability to accept a large capacity military magazine is also the ability to accept a small capacity non-military magazine. A rifle with this feature is obviously readily adaptable to sporting purposes even as narrowly defined in the Study. Further, Congress clarified the matter in the Public Safety and Recreational Firearms Use Protection Act of 1994. Among the "recreational firearms" excluded from the assault weapon category are the Iver Johnson M-1 Carbine and the Iver Johnson 50th Anniversary M-1 Carbine. 18 U.S.C. 922(v)(3) and Appendix A. It is noteworthy that all of the rifles at issue which fire 7.62 NATO, 7.62 x 39 and 5.56 mm cartridges are more accurate and fire at greater ranges than the M-1 carbine.

Based on the above, K.B.I., Inc. respectfully requests that you reverse your initial determination regarding these permits and approve K.B.I., Inc.'s import permits for the rifles in question. Please contact us if you need any further information

Sincerely,

K.B.I., Inc.

A handwritten signature in black ink, appearing to read "Michael B. Kassnar". The signature is fluid and cursive, with a large initial "M" and "K".

Michael B. Kassnar
President

MBK/clp

enclosures



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, D.C. 20226

LE:F:TE:EMO
3311.4

OCT 14 1994

Mr. Michael B. Kassnar
KBI, Inc.
Post Office Box 5440
Harrisburg, Pennsylvania 17110

Dear Mr. Kassnar:

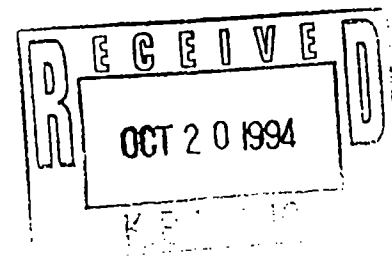
This refers to your letter of September 19, 1994, in which you ask about the classification of the FEG SA-85M rifle under the provisions of 18 U.S.C. § 921(a)(30).

The rifle in question has the same basic mechanism as the AK47 semiautomatic rifle. However, it does not incorporate a folding or telescopic stock, a bayonet mount, or a flash suppressor.

Section 921(a)(30)(A) lists specific firearms that are semiautomatic assault weapons, including AK47 rifles and copies or duplicates of the AK47. This firearm is not an AK47 or a copy or duplicate of that rifle.

Section 921(a)(30)(B) defines a semiautomatic assault weapon to include a semiautomatic rifle that has the ability to accept a detachable magazine and has at least 2 specified features. The weapon in question is a semiautomatic rifle having a pistol grip that protrudes conspicuously beneath the action of the weapon. The firearm does not have a folding or telescoping stock, a bayonet mount, a flash suppressor, a threaded barrel designed to accommodate a flash suppressor, or a grenade launcher. The rifle in question does not contain at least 2 of the specified features.

Based on the above examination, the Hungarian manufactured SA-85M semiautomatic rifle, as described above and previously examined by this office is



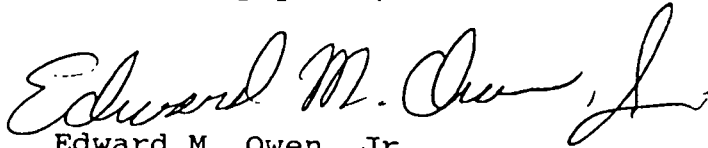
Mr. Michael B. Kassnar

classified as a firearm as that term is defined in 18 U.S.C. § 921(a)(3). It is not a semiautomatic assault weapon as defined. The SA-85M rifle is also suitable for importation under the provisions of 18 U.S.C. § 925(d)(3).

Please be advised that this determination is based on the firearm as submitted. If the design, dimensions, configuration or material used is changed, this classification is subject to review.

We trust that the foregoing has been responsive to your inquiry. If we may be of any further assistance, please contact us.

Sincerely yours,

A handwritten signature in cursive script, reading "Edward M. Owen, Jr.", written in dark ink.

Edward M. Owen, Jr.
Chief, Firearms Technology Branch



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, D.C. 20226

DEC 10 1991

LE:F:TE:EMO
3311.1

Mr. Michael B. Kassnar
K.B.I., Incorporated
Post Office Box 6346
Harrisburg, Pennsylvania 17112

Dear Mr. Kassnar:

This refers to the Hungarian Model SA-85M rifle which was resubmitted to this office on November 27, 1991, for evaluation as to its importability into the United States. The rifle was imported on ATF Form 6 number 91-18896.

Examination of the submitted sample, serial number SM048, indicates that it is a semiautomatic AK47 type rifle in caliber 7.62 x 39mm. The rifle was manufactured by FEG in Budapest, Hungary. The firearm is a semiautomatic assault type rifle that has been modified by replacing the buttstock and pistol grip with a one-piece stock, having a thumbhole type grip, changing the configuration of the forearm, eliminating the upper wooden handguard, and removing the bayonet lug. The muzzle threads have also been eliminated.

The rifle as submitted no longer has the characteristics common to military style assault rifles. The firearm is more in the configuration of a traditional sporting rifle. Therefore, the Hungarian Model SA 85M rifle, as submitted, is suitable for importation under the provisions of Section 925(d)(3), Chapter 44, Title 18, U.S.C.

Please be advised that this determination is based on the sample as submitted. If the design, dimensions, configuration or materials used are changed, this classification is subject to review.

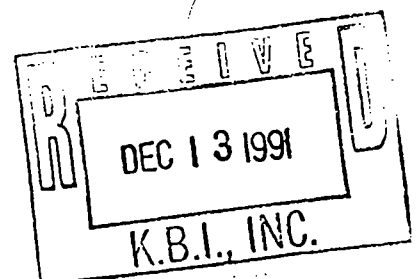
The submitted sample is being returned under separate cover.

We trust that the foregoing has been responsive to your inquiry. If we may be of any further assistance, please contact us.

Sincerely yours,

Carl H. Baillie

for Edward M. Owen, Jr.
Chief, Firearms Technology Branch



AD(F&A)



Savage[®]

"OUR PEOPLE MAKE THE DIFFERENCE"

SAVAGE ARMS, INC.

100 Springdale Road
Westfield, MA 01085
Telephone: (413) 568-7001
Fax: (413) 562-7764

May 7, 1998

John W. Magaw, Director
Bureau of Alcohol, Tobacco & Firearms
U.S. Dept. of the Treasury
Washington, DC 20226
Fax No.: 202-927-8673

RECEIVED
MAY 12 2 32 PM '98
DIRECTOR, BUREAU OF
ALCOHOL, TOBACCO &
FIREARMS

Dear Director Magaw:

In response to your letter dated April 8, 1998, we hereby disagree with your determination that the rifles listed in your letter do not meet the sporting criteria and with your denial or revocation of import permits. We believe that the Department of Treasury Study on the Sporting Suitability of Modified Semiautomatic Assault Rifles (April 1998) is based on legal errors and factual inaccuracies.

We hereby incorporate by reference all records and evidence of every kind whatever known to the Department of the Treasury when it determined that the subject rifles or types of rifles did meet the sporting test as well as when it determined that they did not meet the test. These records and evidence thereby include that which was before Treasury in 1968 when it first determined that such rifle types met the sporting test, when it first determined during or after your 1989 study that the specific subject and types of rifles met the sporting test, and all other records and evidence available to the Department through the present. These records and evidence include not only submissions by this firm but also submissions by all interested persons and entities whatever for the entire period of 1968 to the present.

18 U.S.C. §925(d) provides in part: "The Secretary shall authorize a firearm...to be imported or brought into the United States...if the firearm...(3) is of a type that does not fall within the definition of a firearm as defined in section 5845 (1) of the Internal Revenue Code of 1954 and is generally recognized as particularly suitable for or readily adaptable to sporting purposes, excluding surplus military firearms..."

The rifles at issue here meet both tests in that they are generally recognized as particularly suitable for or readily adaptable to sporting purposes. The rifles are not military rifles, are not used by any military force, and would not even be considered for use by any military force. The rifles have no use other than for sporting purposes, particularly target shooting (competitive and practice) and hunting.

The ability to accept a large capacity military magazine is also the ability to accept a small capacity non-military magazine. Some shooting sports require a large capacity magazine and some require a small capacity magazine.

All of the rifles at issue which fire 7.62 NATO, 7.62x39, and 5.56 mm cartridges are more accurate and fire at greater ranges than the M-1 carbine. Yet the M-1 carbine is in the "recreational firearms" category. 18 U.S.C. §922(v)(3) and Appendix A (listing Iver Johnson M-1 Carbine).

Based on the above, we ask that the rifles at issue be approved for importation. Please contact us directly if you need any further information.

Sincerely,

Ronald Coburn
Chairman/CEO

MAY 07 1998



May 4, 1998

Mr. Walfred A. Nelson
Chief, Firearms & Explosives Regulatory Division
Bureau of Alcohol, Tobacco & Firearms
Room 5100, 650 Massachusetts Avenue, N.W.
Washington, DC 20226

Gentlemen:

We are in receipt of your certified letter dated April 10th whereby you notified us that our application to import our model 551-2-SP for exclusive sale to U.S. Law Enforcement and U.S. Military agencies has been denied. The denial of our application has the practical effect of significantly inhibiting SIG Arms' ability to market and sell this product to our U.S. Law enforcement and U.S. Military customers. We do not believe that this result was intended by Treasury's April determination that semi-automatic assault weapons do not meet the sporting purposes test, nor do we believe that this result is consistent with the letter or intent of the Gun Control Act of 1968 as amended.

We have reviewed with counsel the original intent of the legislation involving the Gun Control Act of 1968 as amended. We feel that it clearly contemplates the importation of this type of weapon for use by U.S. Law Enforcement and U.S. Military. Specifically, 18 USC §925(a)(1) provides in pertinent part that:

§925. Exceptions: Relief from disabilities

(a)(1) The provisions of this chapter, except for provisions relating to firearms subject to the prohibitions on section 922(p), shall not apply with respect to the transportation, shipment, receipt, possession, or importation of any firearm or ammunition imported for, sold or shipped to, or issued for the use of, the United States or any department or agency thereof or any State or any department, agency, or political subdivision thereof.

The April ban on the importation of modified semi-automatic assault weapons was premised on the sole criteria that these weapons do not meet the sporting purposes test. The ban clearly did not and could not have extinguished the law enforcement and military purposes exception to the Gun Control Act of 1968 as amended.

May 4, 1998
Mr. Walfred Nelson, BATF
Page 2

 SIG arms

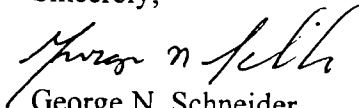
We certainly recognize that you are doing your best to meet the original intent of the Legislation and that this is why you are soliciting any additional information that may apply to our case.

We feel strongly that to not allow us to import product which is manufactured for legitimate law enforcement and military purposes is to discriminate against companies like SIG Arms who import products manufactured overseas (by its parent company) for sale and distribution in the U.S. Domestic companies who also sell to legitimate law enforcement and military agencies are benefiting since they have no restrictions and therefore receive unfair advantage in the market place.

In summary, this is not an issue of sporting use or illegal adaptability. We are dealing with a clearly defined issue of our Company selling a product *exclusively* to legitimate U.S. Law enforcement and U.S. Military which is clearly contemplated by the original legislation passed by Congress.

We appreciate your giving us the opportunity to offer comment and provide additional input and we look forward to working with you in developing a fair solution to this complex problem.

Sincerely,



George N. Schneider
President and Chief Executive Officer



May 7, 1998

John M. Magaw, Director
Bureau of Alcohol, Tobacco and Firearms
U.S. Department of the Treasury
Washington, DC 20226

The Oldest Name In American Firearms

SPRINGFIELD ARMORY

Springfield Inc. • 420 West Main St. • Geneseo, IL 61254
ph. 309/944-5631 • fax 309/944-3676

Dear Mr. Magaw:

In response to your letter dated April 8, 1998, we hereby disagree with your determination that the rifles listed in your letter do not meet the sporting criteria and with your proposed denial or revocation of import permits. We believe that the Department of the Treasury Study on the Sporting Suitability of Modified Semi-automatic Assault Rifles (April 1998) is based on legal errors and factual inaccuracies.

We hereby incorporate by reference all records and evidence of every kind whatever known to the Department of the Treasury when it determined that the subject rifles or types of rifles did meet the sporting test as well as when it determined that they did not meet the test. These records and evidence thereby include that which was before Treasury in 1968 when it first determined that such rifle types met the sporting test, when it first determined during or after your 1989 study that the specific subject rifles and types of rifles met the sporting test, and all other records and evidence available to the Department through the present. These records and evidence include not only submissions by this firm but also submissions by all interested persons and entities whatever for the entire period of 1968 to the present.

Springfield made a sizable submission to you in connection with your 1989 study. No material changes have taken place in the nature of the shooting sports or the sporting uses of the rifles in question since that time. The only change since that time is that our rifles were redesigned to meet your more stringent sporting requirements imposed by your 1989 study.

Your study (Exhibit 2) classifies our SAR-4800 rifle under "FN-FAL Variants." The Browning Arms Co. introduced a semi-automatic look-a-like of the selective fire FN-FAL in 1959. It is our understanding that it was made by FN and imported by Browning in various sport and competition versions from that period through around 1977. Enclosed is a copy of the cover and introduction to the mid-1960's manual "F.N.-Browning Light Semi-Automatic Rifle."

Browning imported only two other semi-automatic rifles in the 1960's—a .22 rifle and the BAR, introduced in 1967. When the Gun Control Act of 1968 passed, the well-known F.N.-Browning Light Semi-Automatic Rifle was approved for import as a sporting rifle. Rifles of this type, including the Springfield Armory

SAR-48, continued to be approved for import as sporting rifles until 1989. In 1989, BATF approved our SAR-4800 for import as a sporting rifle and has continued to do so until the present.

Your study (Exhibit 2) classifies our SAR-8 under "HK Variants," meaning variants of the HK-91 and HK-93. These rifle designs were well known in the mid-1960's and continued to be approved for importation after passage of the Gun Control Act of 1968 until 1989. Springfield Armory's pre-1989 version was the SAR-3. In 1989, BATF approved our SAR-8 for import as a sporting rifle and has continued to do so until the present.

18 U.S.C. 925 (d) provides in part: "The Secretary shall authorize a firearm...to be imported or brought into the United States...if the firearm...(3) is of a type that does not fall within the definition of a firearm as defined in section 5845 (a) of the Internal Revenue code of 1954 and is generally recognized as particularly suitable for or readily adaptable to sporting purposes, excluding surplus military firearms...."

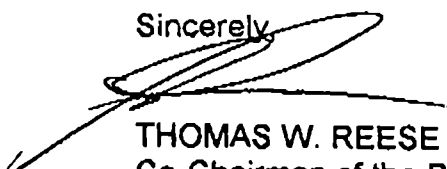
The rifles at issue here meet both tests in that they are generally recognized as particularly suitable for and as readily adaptable to sporting purposes. The rifles are not military rifles, are not used by any military force, and would not even be considered for use by any military force. The rifles have no use other than for sporting purposes, particularly target shooting (competitive and practice) and hunting.

The ability to accept a large capacity military magazine is also the ability to accept a small capacity non-military magazine. Some shooting sports require a large capacity magazine and some require a small capacity magazine.

The rifles at issue here fire 7.62 NATO and 5.56 mm cartridges, which are more accurate and fire at targets at longer distances than the M-1 Carbine. Yet the M-1 Carbine is in the "recreational firearms" category. 18 U.S.C. 922(v)(3) and Appendix A (listing Iver Johnson M-1 Carbine). Our rifles are far superior for target shooting and hunting.

Based on the above, we ask that the rifles at issue be approved for importation. Please contact us if you need any further information.

Sincerely,



THOMAS W. REESE
Co-Chairman of the Board

letter2.dr

F. N. - Browning Light Semi-Automatic Rifle

Caliber .308

For

MILITARY TARGET SHOOTING

and

SPORTING PURPOSES

All rifles sold in the United States are of a special new American model designed to fire semi-automatically only. The change lever can be set in two positions, one which is the "On Safe" position, the other for semi-automatic function only. Since this instruction booklet was prepared primarily for the NATO Military Model now being used by many European and South American countries, all reference throughout its contents to automatic rather than semi-automatic function should be disregarded.

Although the use of this rifle in this country is considered primarily for law enforcement agencies or for military type target practice shooting, it is possible someone may contemplate using it for hunting. In that event, since game laws in some states either limit the use of self-loading rifles for hunting or the magazine capacity of a rifle carried in the presence of game, it would be wise to contact your Fish and Game Department if you should consider using your F.N.-Browning Rifle for hunting purposes. The 10 shot magazine can be easily reduced in capacity to the usual lawful maximum for hunting of 5 rounds by cutting a block of wood to insert into the magazine (through disassembly of the magazine) to reduce the capacity movement of the magazine follower. This is the same principle used on many 5 and 6 shot semi-automatic or repeating shotguns to reduce them to 3 shots for Federally regulated migratory fowl hunting.

F. N. - Browning

Light Semi-Automatic Rifle

Caliber .308

BROWNING ARMS COMPANY

St. Louis 3, Missouri, U. S. A.

and

BROWNING ARMS COMPANY OF CANADA, LTD.

P. O. Box 991, Montreal 9, Quebec, Canada

K 7



UZI[®] AMERICA, INC.

A subsidiary of:
O.F. Mossberg & Sons, Inc.

May 5, 1998

John W. Magaw, Director
Bureau of Alcohol, Tobacco & Firearms
U.S. Department of the Treasury
Washington, DC 20226

▲
MAY 11 1998
RECEIVED

Dear John W. Magaw, Director,

SUBJECT: SPORTING SUITABILITY

Dear Director Magaw,

I very much respect your opinion in the letter of April 8, 1998 regarding the determination that certain listed rifles do not meet the sporting use criteria. I also realize that decisions like this are based on substantial research, careful analysis and thorough review. Although much effort was expended on this study, there exist a few significant errors, which, if given proper consideration, should change the outcome of the study.

One area of particular concern is the blatant disregard for the "readily adaptable..." provision of the statute. I am sure there was a reason for its original inclusion, and although the April 1998 study has several references to it, by page 21 it gets watered down to a point of exclusion at the bottom of the first paragraph. Was there a reason for this verbiage or were the authors merely wasting ink? I happen to believe that there was a particular purpose for this provision.

Another significant error exists on page 29, point number 2:

"The models based on the AK47 design are limited to competitions of 200 yards or less because the 7.62 x 39mm cartridge, which is used by these models, generally has an effective range only between 300 and 500 yards."

This is simply incorrect. There are several AK variants that fire different calibers than that listed, and I would argue strongly that the 7.62 x 39mm is pretty darned effective beginning from zero yards out to 500 yards.

There are many other points that are materially incorrect, but again I realize this is a subject prone to much debate. The bottom line obviously is that these firearms are in no way different from their counterparts produced domestically and they are used legitimately by the vast majority of honest law abiding gun owners. The criminal and the criminally intent will not be too upset with any study or any change in the law.

UZI[®] America, Inc.

7 Grasso Avenue, North Haven, CT 06473

Phone 203-230-5460 Fax: (203) 230-5420

May 8, 1998

Further and specifically relevant to our business, our suppliers, customers and employees is the following:

The Galil Sporter (previously approved) fires 7.62 mm NATO cartridges. It is far more accurate and more reliable than the M-1 carbine. Yet, the M-1 carbine is in the "recreational firearms" category. 18 U.S.C. § 922(v)(3) and appendix A listing Iver Johnson M-1 Carbine). The Galil Sporter is far superior for target shooting and hunting.

The UZI American (previously approved) fires 9mm and is available in .40S&W, .41A&E, and .45ACP. Significantly, the last three calibers were not mentioned in the study, which is an important factual omission. The Uzi design was painted as "inadequate" for hunting as its accuracy drops off after 100 yards. This was assuming all Uzi's are chambered in 9mm, which is false. Even so, most small game is hunted at ranges much less than 100 yards and many competitive target shooting events are at distances less than 100 yards. Recreational shooting, an "illegitimate" use of imported semi-auto firearms (but not for domestically produced arms), is of course at distances of generally 25 to 100 yards. Among the recreational firearms listed in Appendix A to 18 U.S.C. § 922 (v)(3) is the Marlin Model 9 Camp Carbine, which fires the 9mm cartridge from a 12 shot magazine (as manufactured on October 1, 1993). The Uzi American is just as sporting as the Marlin carbine and others, particularly for target shooting and small game.

Based on the above information, we ask that the rifles at issue be approved for importation as they already recently were. Please contact us if you need further information.

Sincerely,


Jonathan E. Mossberg
President

Ronald D. Yates Sporting Guns & Etc.**7311 Galveston Road Suite 260****Houston TX 77034****Phone 713 944 3351 Fax 713 944-3581**

May 7, 1998

John W. Magaw, Director
Bureau of Alcohol, Tobacco and Firearms
U.S. Department of the Treasury
650 Massachusetts Avenue, NW
Washington, D.C. 20226

RECEIVED
May 12 2 25 PM '98
DIRECTOR, BUREAU OF
ALCOHOL, TOBACCO &
FIREARMS

RE: The revocation of import permit no. 97-00874

Dear Director Magaw:

In response to your letter of April 8 1998 Ronald D Yates Sporting Guns & Etc does hereby appeal the decision to deny or revoke the above listed import permit as the rifles in question do meet the sporting criteria set out in the Gun Control Act of 1968, 18 U.S.C. § 925(d). We believe that the Department of the Treasury Study on the Sporting Suitability of Modified Semiautomatic Assault Rifles (April 1998) is based on legal errors and factual inaccuracies.

We hereby incorporate by reference all records and evidence of every kind whatever known to the Department of the Treasury when it determined that the subject rifles or types of rifles did meet the sporting test, as well as when it determined that they did not meet the test. These records and evidence thereby include that which was before Treasury in 1968 when it first determined that such rifle types met the sporting test, when it first determined during or after your 1989 study that the specific subject rifles and types of rifles met the sporting test, and all other records and evidence available to the Department through the present. These records and evidence include not only submissions by this firm but also submissions by all interested persons and entities whatever for the entire period of 1968 to the present.

18 U.S.C § 925(d) provides in part:

The Secretary shall authorize a firearm...to be imported or brought into the United States... if the firearm...(3) is of a type that does not fall within the definition of a firearm as defined in section 5854(a) of the Internal Revenue Code of 1954 an is generally recognized as particularly suitable for or readily adaptable to sporting purposes, excluding surplus military firearms...

The rifles in question here meet both tests in that they are generally recognized as particularly suitable for and readily adaptable to sporting purposes. The rifles are not military rifles, are not used by any military force, and would not even be considered for

use by any military force. The rifles have no use other than for sporting purposes, particularly target shooting (competitive and practice) and hunting.

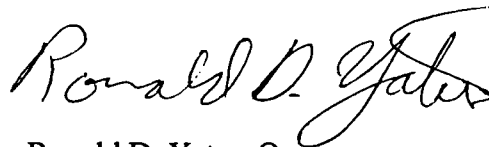
The ability to accept a large capacity military magazine is also the ability to accept a small capacity non-military magazine. A rifle with this feature is obviously readily adaptable to sporting purposes even as narrowly defined in the *Study*.

Further, Congress clarified the matter in the Public Safety and Recreational Firearms Use Protection Act of 1994. Among the "recreational firearms" excluded from the assault weapon category are the Iver Johnson M-1 Carbine and the Iver Johnson 50th Anniversary M-1 Carbine. 18 U.S.C 922(v)(3) and Appendix A. It is noteworthy that all of the rifles at issue which fire 7.62 NATO, 7.62 x 39, and 5.56 mm cartridges are more accurate and fire at greater ranges than the M-1 carbine.

The SLR-95 is regarded as an extremely accurate and reliable variation of this type of rifle. It is used extensively for hunting feral hogs and deer in Texas. It is also widely used for informal target shooting. Please note that it is supplied with only a five round magazine. If it is not suitable for sporting use, then no semi-automatic hunting rifle would be suitable. American citizens have been hunting with semi-automatic rifles since the early part of this century. By your actions, you are casting aspersions on millions of law-abiding and voting citizens of this country.

Based on the above, Ronald D Yates Sporting Guns & Etc respectfully requests that you reverse your initial determination regarding these permits and approve Ronald D Yates Sporting Guns & Etc's import permits for the rifles in question. Please contact us if you need any further information.

Sincerely yours,

A handwritten signature in black ink that reads "Ronald D. Yates". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Ronald D. Yates, Owner

Ronald D Yates Sporting Guns & Etc