U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Martinsburg, WV 25405

www.atf.gov

OCT 3 1 2013

903050:MRC
3311/301071

Dear Mr. Stakes,

This is in reference to your correspondence (including copy of a patent application), with accompanying AR-type fire-control components, received by the Firearms Technology Branch (FTB), Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). In your cover letter, you asked FTB to examine this "3MR™" trigger assembly (see enclosed photo) and determine its classification.

For your reference in this matter, the National Firearms Act, 26 U.S.C. Section 5845(b), defines "**machinegun**" as—

> *...any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon,* ***any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun,*** *and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.*

As indicated, your prototype trigger has three modes: safe mode, a match grade semi-automatic mode, and another match grade semiautomatic mode with a positive reset characteristic. In support of this product, you point out that it will provide tactical and competition shooters with a "safer, faster, and more reliable trigger group." It is also intended to provide positive resets between each shot.

The FTB examination confirmed that the trigger unit consists of a housing, hammer, trigger, disconnector, selector, springs, and reset lever that are designed to be used in an AR-15 type platform. Our examination disclosed that when the selector is placed in the vertical position (apex at 12 o'clock), the trigger, disconnector, and hammer function as any AR-semiautomatic type trigger is designed to do. Further examination also showed that when the selector was placed in the horizontal position (apex at 3 o'clock), the reset lever pivots forward, and the hammer engages/contacts the lever during the cycling of the rifle. In this position, the hammer contacts the reset lever during cocking, which applies force to the trigger, forces the shooter's finger forward, and allows the trigger to reset rapidly.

In the course of our evaluation, FTB personnel installed the submitted 3MR™ trigger into an AR-15 type rifle housed in the ATF National Firearms Collection for test firing. During this phase, a function test was performed before live-fire was conducted. The 3MR™ functioned only semi automatically during both the field test and live-firing.

In conclusion, FTB has determined that the 3MR™ trigger assembly is not a part or combination of parts that will convert a semiautomatic firearm into a machinegun. Your sample will be returned via the FedEx account number provided in your cover letter.

We thank you for your inquiry and trust the foregoing has been responsive to your evaluation request.

Sincerely yours,

Earl Griffith
Chief, Firearms Technology Branch

Enclosure