



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Martinsburg, WV 25405

www.atf.gov

JUN 26 2019

907010: DAS
3311/310266

Mr. Louis Frutuoso,
Standard Manufacturing Co., LLC
100 Burritt Street
New Britain, CT 06053

Dear Mr. Frutuoso,

This refers to your letter to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB), which accompanied your submitted sample of one Standard Manufacturing Company, LLC, model S333, .22 Magnum caliber, two-barrel pistol. Specifically, you requested an evaluation and classification of this sample.

For your reference, the amended Gun Control Act of 1968 (GCA), 18 U.S.C. § 921(a)(3), defines the term “**firearm**” to include: “*any weapon (including a starter gun) which will or is designed to or may be readily converted to expel a projectile by the action of an explosive...the frame or receiver of any such weapon....*”

The GCA, 18 U.S.C. § 921(a)(23), defines the term “**machinegun**” to mean: “*the meaning given such term in section 5845(b) of the National Firearms Act.*”

Further the Title 27 CFR, §478.11, defines the term “**pistol**” as: “*A weapon originally designed, made, and intended to fire a projectile (bullet) from one or more barrels when held in one hand, and having (a) a chamber(s) as an integral part(s) of, or permanently aligned with, the bore(s); and (b) a short stock designed to be gripped by one hand and at an angle to and extending below the line of the bore(s).*”

The National Firearms Act (NFA), 26 U.S.C. §5845(b) defines the term “**machinegun**” to include: “*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....*”

27 CFR § 478.11 defines “machinegun,” in part, by including the following: “...For purposes of this definition, the term “automatically” as it modifies “shoots, is designed to shoot, or can be readily restored to shoot,” means functioning as the result of a self-acting or self-regulating mechanism that allows the firing of multiple rounds through a single function of the trigger; and “single function of the trigger” means a single pull of the trigger and analogous motions. The term “machine gun” includes a bump-stock-type device, i.e., a device that allows a semi-automatic firearm to shoot more than one shot with a single pull of the trigger by harnessing the recoil energy of the semiautomatic firearm to which it is affixed so that the trigger resets and continues firing without additional physical manipulation of the trigger by the shooter.”

27 CFR § 479.11 defines “machinegun,” in part, by including the following: “...For purposes of this definition, the term “automatically” as it modifies “shoots, is designed to shoot, or can be readily restored to shoot,” means functioning as the result of a self-acting or self-regulating mechanism that allows the firing of multiple rounds through a single function of the trigger; and “single function of the trigger” means a single pull of the trigger and analogous motions. The term “machine gun” includes a bump-stock-type device, i.e., a device that allows a semi-automatic firearm to shoot more than one shot with a single pull of the trigger by harnessing the recoil energy of the semiautomatic firearm to which it is affixed so that the trigger resets and continues firing without additional physical manipulation of the trigger by the shooter.”

Further, please note that 27 CFR § 478.92 states the following:

(1) You, as a licensed manufacturer or licensed importer of firearms, must legibly identify each firearm manufactured or imported as follows:

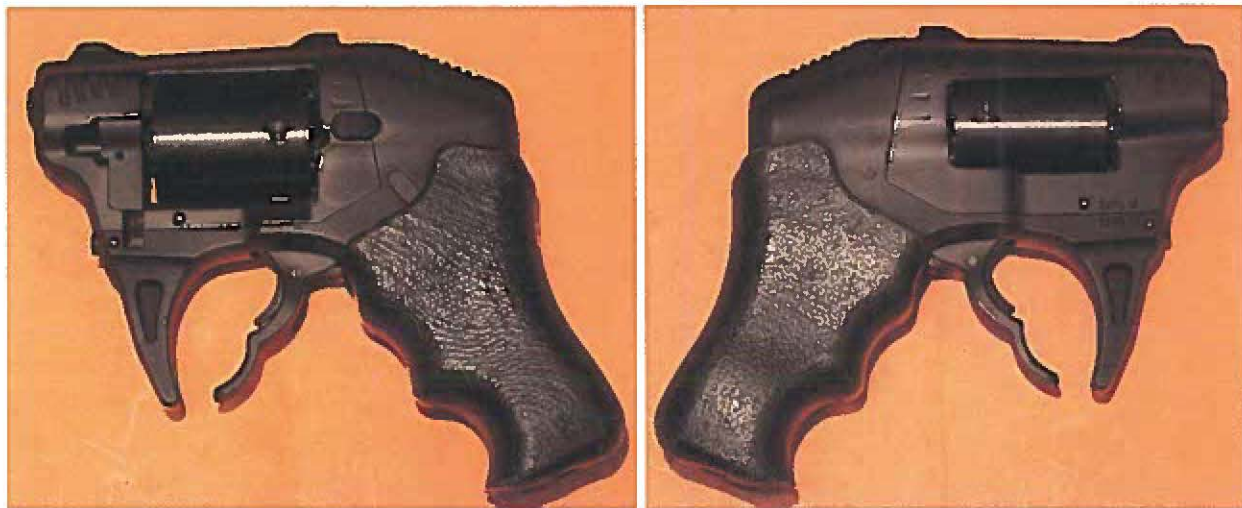
- (i) By engraving, casting, stamping (impressing), or otherwise conspicuously placing or causing to be engraved, cast, stamped (impressed) or placed on the frame or receiver thereof an individual serial number. The serial number must be placed in a manner not susceptible of being readily obliterated, altered, or removed, and must not duplicate any serial number placed by you on any other firearm. For firearms manufactured or imported on and after January 30, 2002, the engraving, casting, or stamping (impressing) of the serial number must be to a minimum depth of .003 inch and in a print size no smaller than 1/16 inch; and*
- (ii) By engraving, casting, stamping (impressing), or otherwise conspicuously placing or causing to be engraved, cast, stamped (impressed) or placed on the frame, receiver, or barrel thereof certain additional information. This information must be placed in a manner not susceptible of being readily obliterated, altered, or removed. For firearms manufactured or imported on and after January 30, 2002, the engraving, casting, or stamping (impressing) of this information must be to a minimum depth of .003 inch. The additional information includes:*
 - (A) The model, if such designation has been made;*
 - (B) The caliber or gauge;*
 - (C) Your name (or recognized abbreviation) and also, when applicable, the name of the foreign manufacturer;*
 - (D) In the case of a domestically made firearm, the city and State (or recognized abbreviation thereof) where you as the manufacturer maintain your place of business; and*

(E) In the case of an imported firearm, the name of the country in which it was manufactured and the city and State (or recognized abbreviation thereof) where you as the importer maintain your place of business. For additional requirements relating to imported firearms, see Customs regulations at 19 CFR part 134.

(2) Firearm frames or receivers. A firearm frame or receiver that is not a component part of a complete weapon at the time it is sold, shipped, or otherwise disposed of by you must be identified as required by this section.

Results of the FTISB examination of the submitted firearm, fully identified below, is as follows:

Standard Manufacturing Company, Model S333, .22 Magnum, pistol, serial number EXPS14



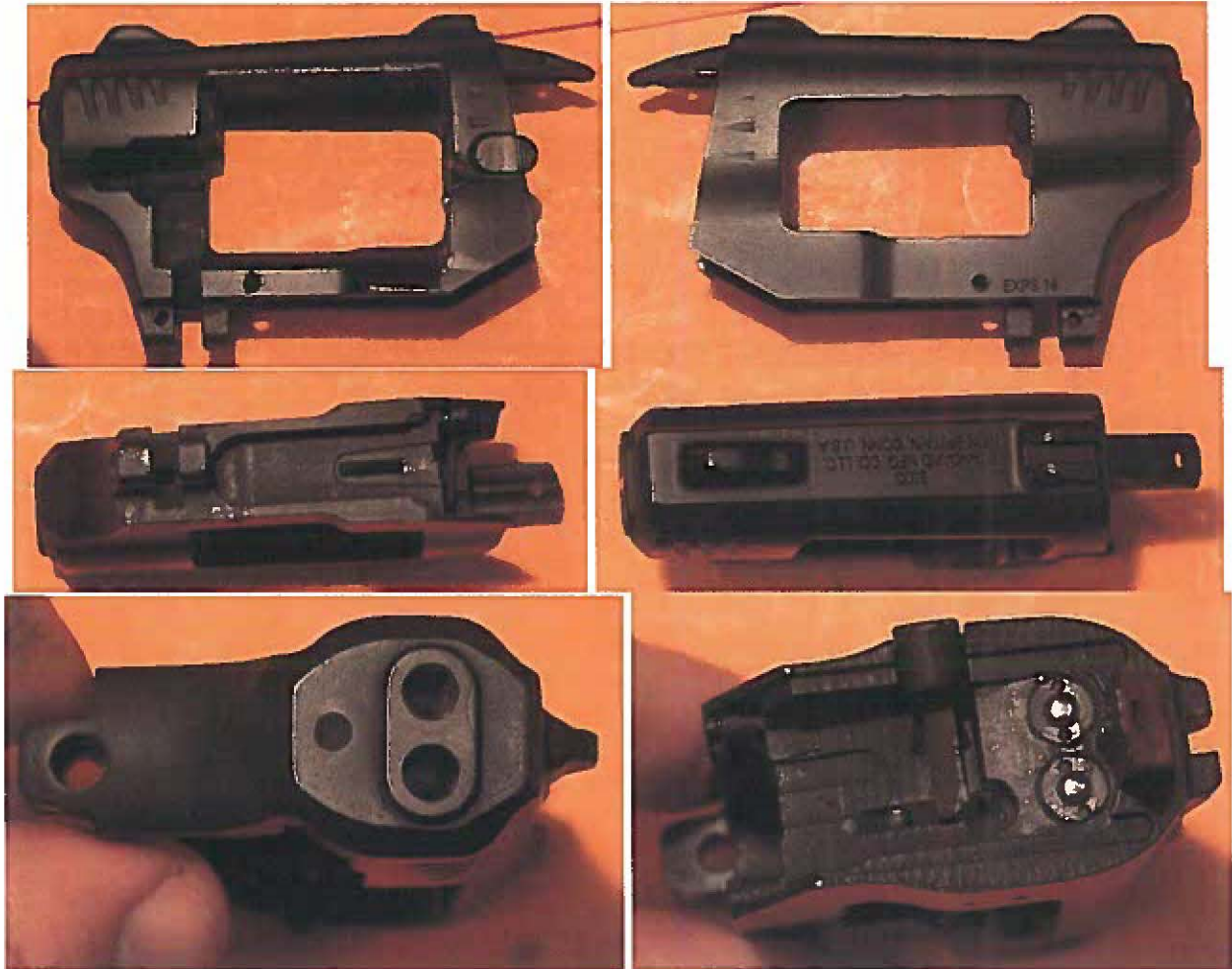
Overall Length	- approximately 5-5/8 inches.
Barrel lengths (6)	- approximately 1-1 /4 inches (rifled bores)
Height	- approximately 4-3/4 inches.
Frame Construction	- Nonferrous metal.
Weight	- 18.48 ounces.
Caliber	- .22 Magnum.
Safety Features	- Trigger safety
Miscellaneous	- Double-action.

Further, FTISB found the following markings:

Frame (top):	S333 STANDARD MFG. CO. LLC.
Frame (right):	EXPS14 [serial number]
Grip (right):	EXPS14

FTISB has determined that the portion of the submitted sample that holds the barrels, cylinder, and firing pins is the frame.

Standard Manufacturing Company, Model S333, Frame



FTISB found that the submitted sample has a cylinder similar to a revolver that must have each chamber manually loaded prior to firing and spent cases manually ejected.

FTISB found that the submitted sample operated in the following manner:

1. Each chamber in the cylinder is manually loaded.
2. Cylinder is closed and locked into the frame.
3. The trigger safety is pulled to the face of the trigger which allows disengagement of the safety.
4. The trigger is pulled to the rear causing the following actions and cycle of operation:
 - The cylinder lock is dropped out of engagement.
 - The hand turns the cylinder to its next proper alignment for firing.
 - The cylinder lock reengages the cylinder.

- The hammer is drawn to the rear.
 - The firing pin block blade drops to allow the hammer to hit the firing pins.
 - The hammer is drawn back and released.
 - The two (2) firing pins are struck.
 - The two (2) aligned cartridges primers are ignited causing the propellant powder in each cartridge to ignite and expel the two (2) projectiles down the rifled bores and out of the weapon.
 - The trigger is released.
5. The trigger is pulled again to continue firing the loaded cylinder.
 6. Once firing is complete, the cylinder is opened from the frame and the ejector is used to remove the cartridges.

FTISB has determined that the submitted sample does shoot more than one (1) shot, without manual reloading, by a single function (single pull) of the trigger. With one pull of the trigger the submitted firearm uses a single sear and hammer to strike two (2) firing pins firing two (2) cartridges.

The submitted sample **does not automatically** allow the firing of multiple rounds, as a function of a self-acting or self-regulating mechanism, through utilizing a portion of the energy of the fired cartridges or by harnessing the recoil energy.

All functions of the submitted sample are performed manually, therefore, it is classified as a “**firearm**” under the GCA, 18 U.S.C. § 921(a)(3).

If the design, dimensions, configuration, or method of operation were changed, these findings would be subject to review.

To facilitate return of the submitted sample, please provide FTISB with an appropriate FedEx account number or prepaid shipping label within 60 days of receipt of this letter referencing #310266.

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

Sincerely yours,



Michael R. Curtis

Chief, Firearms Technology Industry Services Branch