



**U.S. Department of Justice**

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Martinsburg, WV 25405  
www.atf.gov

OCT 24 2016

907010:BAH *MD*  
3311/303918

Mr. Michael Graham  
Re-Mil LLC  
5200 Wheeler Canyon Road  
Santa Paula, CA 93060

Dear Mr. Graham,

This refers to your inquiry to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB), which accompanied your submitted prototype of a semiautomatic version of a CZ26-type machinegun. Specifically, you requested an examination and classification of the submitted sample.

As background to our evaluation, 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...[and] ...the frame or receiver of any such weapon....*

Further, the National Firearms Act (NFA), 26 U.S.C. § 5845(b), defines "machinegun" to mean—

*...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.*

Additionally, 27 CFR § 478.92 states the following:

*...each licensed manufacturer or licensed importer of any firearm manufactured or imported shall legibly identify each such firearm 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 in a manner not susceptible of being readily obliterated, altered, or removed, an individual serial number*

*not duplicating any serial number placed by the manufacturer or importer on any other firearm, and by engraving, casting, stamping (impressing), or otherwise conspicuously placing or causing to be engraved, cast, stamped (impressed), or placed on the frame or receiver, or barrel thereof in a manner not susceptible of being readily obliterated, altered or removed, the model, if such designation has been made; the caliber or gauge; the name (or recognized abbreviation of same) of the manufacturer and also, when applicable, of the importer; in the case of a domestically made firearm, the city and State (or recognized abbreviation thereof) wherein the licensed manufacturer maintains its place of business; and in the case of an imported firearm, the name of the country in which manufactured and the city and State (or recognized abbreviation thereof) of the importer.*

Furthermore, 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 a minimum height of 1/16 inch. All other markings must be of a minimum depth of .003 inch.

The GCA, § 922(r), prohibits assembly of certain ***semiautomatic rifles*** and shotguns from **imported parts**. Also, the implementing regulations contained in 27 CFR §478.39 include the stipulation that “no person shall assemble a semiautomatic rifle or any shotgun using more than 10 of certain **imported parts**, if the assembled firearm is prohibited from importation under 18 U.S.C. § 925(d)(3) as not being particularly suitable for or readily adaptable to sporting purposes.”

- (1) Frames, receivers, receiver castings, forgings or stampings
- (2) Barrels
- (3) Barrel extensions
- (4) Mounting blocks (trunnions)
- (5) Muzzle attachments
- (6) Bolts
- (7) Bolt carriers
- (8) Operating rods
- (9) Gas pistons
- (10) Trigger housing
- (11) Triggers
- (12) Hammers
- (13) Sears
- (14) Disconnectors
- (15) Buttstocks
- (16) Pistol Grips
- (17) Forearms, handguards
- (18) Magazine bodies
- (19) Followers
- (20) Floorplates



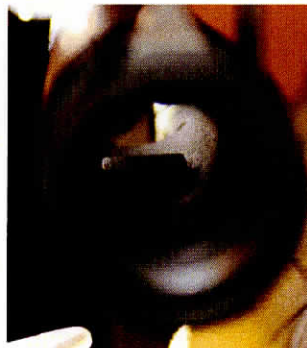
Results of the FTISB examination of the submitted firearm, fully identified below, are as follows:

**Re-Mil LLC, Model RMZ-26, Semiautomatic Rifle, Caliber 7.62 x 25mm,**  
**Serial Number A001**



The FTISB examination noted that the device is configured as a semi-automatic only version of a CZ-26:

- A blocking bar is welded into the internal area of the newly-created receiver which prevents an original, unmodified machinegun bolt from being fully inserted.



- The U.S. made receiver was manufactured without a cutout to prevent insertion of a machinegun fire control group with the follower arm in place.

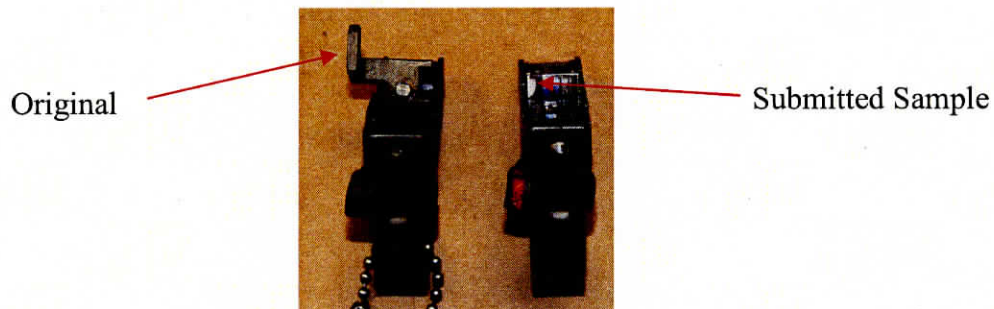


Original  
Machinegun  
Receiver

Submitted Sample



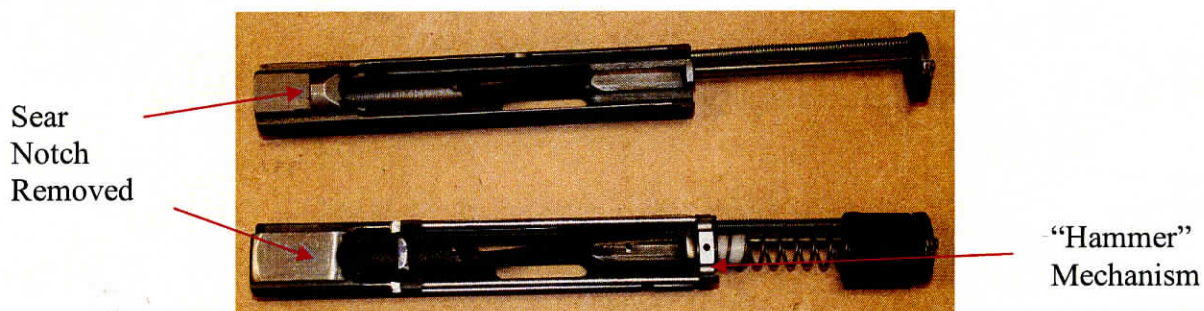
- The submitted fire control group was modified by the removal of the automatic follower, and the sear disconnect.



- The auto retaining lever was eliminated from the submitted trigger.

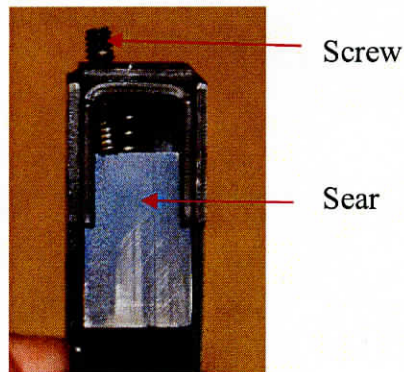


- The submitted bolt was modified by removal of the auto-sear catch and machining to allow adaptation of a closed bolt system.

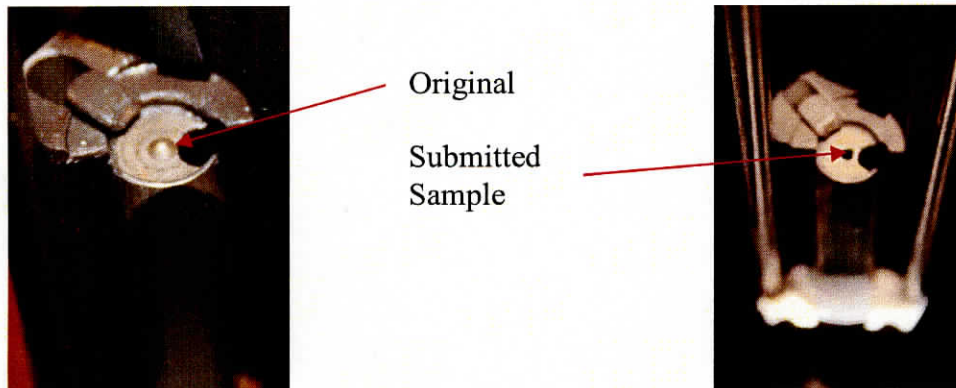


- The submitted fire control group had a screw in the front portion which had been adhered with Loctite. The location of this screw affected the relationship of the sear to the hammer mechanism. FTISB personnel adjusted this screw to the point where the sear no longer engaged the hammer and the weapon was then test fired. Even in this configuration, the firearm did not fire automatically.





- The submitted firing mechanism was redesigned as a closed bolt system and the fixed firing pin was replaced with a floating firing pin.



- The barrel was measured in accordance with standard procedures and reflected an approximate length of 16-3/16 inches.



The FTISB examination confirmed that fire-control components in an original machinegun arrangement cannot be installed in your submitted sample receiver. Additionally, the receiver, in its present configuration, does not incorporate machinegun design features and cannot be readily restored to a machinegun configuration; therefore, your submission does not incorporate the frame or receiver of a "machinegun." It is a "firearm" as defined in the GCA, § 921(a)(3).

FTISB has established a foreign-parts list specific to some CZ-26 models, and Branch personnel have determined that the following parts listed in 27 CFR §478.39 apply as follows:

CZ-26

- |                    |                  |                        |
|--------------------|------------------|------------------------|
| 1. Receiver        | 7. Operating Rod | 12. Forearm/Hand Guard |
| 2. Barrel          | 8. Trigger       | 13. Magazine Body      |
| 3. Trunnion        | 9. Hammer        | 14. Follower           |
| 4. Bolt            | 10. Disconnecter | 15. Floorplate         |
| 5. Trigger Housing | 11. Buttstock    | 16. Sear               |
| 6. Pistol Grip     |                  |                        |

Because certain semiautomatic rifles are currently prohibited from importation, the assembly of such rifles using more than 10 of the above imported parts is prohibited under § 922(r). However, assembly of a semiautomatic rifle using 10 or fewer of these imported parts is not prohibited under this section.

During the examination it was noted that the below imported items were used in the making of the submitted sample.

- |                    |                        |
|--------------------|------------------------|
| 1. Bolt            | 6. Buttstock           |
| 2. Operating Rod   | 7. Pistol Grips        |
| 3. Trigger Housing | 8. Forearms, Handguard |
| 4. Trigger         | 9. Magazine Body       |
| 5. Disconnecter    | 10. Follower           |

Accordingly, FTISB finds that in its current configuration, this semiautomatic CZ-26 type firearm, in 7.62 x 25mm caliber, is made with no more than 10 of the above-listed imported parts; its manufacture, therefore, would not be in violation of 18 U.S.C. § 922(r).

We caution that these findings are based on the sample as submitted. If the design, dimensions, configuration, method of operation, or materials used were changed, our determination would be subject to review.

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

We thank you for your inquiry and trust that the foregoing has been responsive.

Sincerely,



Michael R. Curtis  
Chief, Firearms Technology Industry Services Branch