

Miller Law
Group
ATTORNEYS AT LAW

(203) 733-2887
(203) 299-0550 FACSIMILE
Gregory J. Miller, Esq.
gmill@light14.com

December 1, 2014

Mr. Douglas M. Hoon
ComGraf, LLC
Guilford, CT 06437

**RE: Our Compliance Review of the
ComGraf Model CGAR15FM**

Dear Doug:

For the reasons set forth below, we have concluded that a rifle which is manufactured utilizing your fixed magazine lower receiver (which you have registered with the ATF as the **ComGraf Model CGAR15FM**), is not an Assault Weapon as defined in Connecticut Public Act 13-3, as amended by Public Act 13-220. At the core of the definition of an Assault Weapon is that the rifle must have an ability to accept a detachable magazine, or under certain circumstances have a fixed magazine with more than 10 rounds. Your design when utilized as sold has neither. Nor is not a copy of a firearm defined as an Assault Weapon. Accordingly under Connecticut Law, it is classified as a "Long Gun" and may be transferred and used in the same manner as, for instance, a bolt action rifle.

In reaching this conclusion we note that you are registered with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") as a Manufacturer and that the receiver is not a modification of a rifle built by another company, but is instead completely of your own design and manufacture. (We are quite familiar with the method of operation of most modern rifles, as our firm has worked with clients in the firearms industry for 30 years.)

As part of our analysis we examined the rifle and attempted to insert a conventional detachable magazine. We found that the internal geometry of the magazine well and the mechanisms which would retain a detachable magazine have been cleverly modified to frustrate attempts to insert and or affix a detachable magazine. We found that the necessary magazine release slot and magazine release button counterbore in the frame do not exist and other key features have been changed to make it impossible for an individual to utilize this in the same manner as a rifle capable of accepting a detachable magazine. As the rifle cannot accept a detachable magazine in the normal sense, we then sought to determine whether the fixed magazine might be readily removed and reloaded in the manner of a detachable magazine. We found that you have used a special blind nut installed from inside of the magazine to fix it in place. This nut requires special tooling for removal and replacement of the magazine for cleaning. We also note that removal can only be done with an empty magazine as a special tool must be inserted completely through the magazine in order to reach the blind locking nut which retains the device. Removal for cleaning took us several minutes and our attempts to remove it without the special tools you provided were not successful. Any gun can be disassembled for cleaning, and the removal of this fixed magazine was, if anything, more difficult than on other typical firearms which are readily recognized as having a fixed magazine.

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The combination of the frame, which is structurally different from a normal AR15 lower receiver, combined with the features you have added (or deleted) make it exceedingly difficult to modify the rifle for use with a detachable magazine. In our opinion these substantial changes meet the requirements (both the letter and spirit of the law) for this rifle to be classified as possessing a fixed magazine, i.e., a rifle not having the ability to accept a detachable magazine.

To summarize, as the rifle is neither a named model, nor a copy of a named model, nor a rifle capable of accepting a detachable magazine, nor can the magazine be readily modified to hold more than 10 rounds in a fixed magazine, it is therefore, by definition, outside of the "Assault Weapon's Act". It is of course still a firearm and would need to be transferred and used in Connecticut in the same manner as, for instance, a bolt action rifle. We have attached several photos showing key characteristics which further clarify that this is not an Assault Weapon under Connecticut Law as of this date.

Any rifle can be illegally modified in a manner that it would violate any number of laws. But, we believe that this design is sufficiently unique that it is outside of the parameters of the Act. Given the lack of cases interpreting the new law, we caution that one must continue to monitor this fluid area of law, but as of this date, we conclude that this firearm is not an Assault Weapon if utilized as designed and manufactured by your company.

Sincerely,

Gregory J. Miller



GJM;mc

Encls.