



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Martinsburg, West Virginia 25405
www.atf.gov

903050:MRC
3311/2012-1193

FEB 04 2013

Mr. Denny Butts
CNC Warrior, LLC
605 Toddville Road
Charlotte, North Carolina 28214

Dear Mr. Butts:

This is in reference to your correspondence and VZ58-style receiver submission to the Firearms Technology Branch (FTB), Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). The submitted item is a machined, Czech, VZ58-type receiver (see enclosed photo). In your correspondence, you inquire whether this receiver qualifies as a firearm under the Gun Control Act of 1968 (GCA) and/or the National Firearms Act of 1934 (NFA).

Please note, as background, that the GCA, 18 U.S.C. Section 921(a)(3), defines the term "**firearm**" as follows: *... (A) any weapon (including a starter gun) which will or is designed to or may readily be converted to expel a projectile by the action of an explosive; (B) the frame or receiver of any such weapon; (C) any firearm muffler or firearm silencer; or (D) any destructive device. Such term does not include an antique firearm.*

Also the NFA, 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.

The VZ58 is a machinegun and was originally manufactured for the Czechoslovak military. The sample you submitted to FTB has been manufactured to replicate an original VZ58 on the exterior. However, the interior fire-control cavity has been designed for semiautomatic fire-control components.

Mr. Denny Butts

The FTB examination confirmed that your receiver has the following machining operations/features completed:

- Selector hole.
- Trigger slot.
- Pistol-grip nut slot.
- Holes drilled for trigger guard.
- Cavity machined for bolt catch.
- Cavity machined for magazine catch.
- Hole drilled for lower barrel guard cross pin.
- Hole for sear cross pin.
- Hole for trigger cross pin.
- Barrel channel.
- Gas piston cavity.
- Hole drilled for top cover cross pin.
- Receiver drilled and threaded for stock screw.
- Receiver machined for ejector.

The exemplar submitted has an expansion area behind the magazine well that measures approximately 1.682 inches in length. There is no sear trip cutout in the expanded bridge area. The VZ58 machinegun has a measurement of approximately .890 inch in length in that area. Our Branch has previously determined that 1.8 inches is the standard length for a semiautomatic receiver in the expanded bridge portion.

Based on our evaluation of this receiver, including the features listed above, FTB has determined that your VZ58 receiver has reached a point in manufacturing to fall within the GCA classification of a "firearm." However, it does not have the design characteristics of a machinegun and would not be classified as an NFA firearm.

We trust the foregoing has been responsive to your evaluation request.

Sincerely yours,



Earl L. Griffith
Chief, Firearms Technology Branch

Enclosure

Mr. Denny Butts

CNC Warrior, LLC, VZ58 Semiautomatic Receiver

