



**DEPARTMENT OF THE TREASURY  
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS  
WASHINGTON, DC 20226**

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903050 :GKD  
3311/0-826

**Mr. Steve Barnhart**

This refers to your letter of August 6, 2000, asking for classification under the Federal firearms laws of the BMI Two-Twenty-Two Negotiator II device manufactured by your company.

This device consists of a tripod, two perforated barrel jackets, a main frame with a trigger assembly, mounting hardware, and two sights. The main frame is intended to mount two Ruger Model 10-22 .22 Long Rifle caliber barreled receivers. When mounted, the trigger of each firearm would be positioned, on a metal stud, these studs being mounted on a movable metal bar with contacts positioned to touch the camshaft surfaces. The trigger assembly consists of a grip, trigger, and a camshaft, this camshaft operated by a hand crank wheel, when assembled, pulling the trigger moves the cam surfaces into contact with the metal bar that holds the trigger studs. Turning the handwheel will rotate the cam shaft, the cam surfaces striking the right and left sides of the bar alternately. This operation will retract the trigger of each Ruger firearm, causing one round of ammunition to be discharged at each contact.

Based on examination of the device submitted with your letter, the Ruger firearms intended to be used on this mount would operate in a semiautomatic mode, each firearm discharging one round of ammunition by a single function of the trigger.

Mr. Steve Barnhart

The BMI Two-Twenty-Two Negotiator II, by itself, does not constitute a firearm as defined in either the Gun control Act of 1968 (GCA) or the National Firearms Act (NFA).

This determination applies when the device is manually operated. Functioning of the device by means of an electric motor or other alternate power source could cause this classification to be changed. An assembly as described above, powered by electric drive, may meet the definition of a machinegun, as the actuating switch for the electric drive could be considered the trigger, a single function of which would cause than 0:19 round to be discharged from the assembled device.

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

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Curtis H.A. Bartlett". The signature is written in a cursive style and is somewhat faded.

Curtis **H.A.** Bartlett Chief,