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New York State Police
1220 Washington Avenue
Building 22
Albany, NY 12226

Re: ARMagLock & the New York SAFE Act

Dear Sergeant - Station Commander,

I am writing you on behalf of my client, Mr. Courtney Harris, who is the business owner and patent holder of a product named ARMagLock. This product converts an AR-type rifle into a fixed magazine firearm, and is designed specifically for states with restrictions on AR-type rifles with removable magazines. The ARMagLock is currently being purchased and utilized by numerous New York state firearms dealers and residents.

The applicable portion of the SAFE Act defines an assault weapon as “a semiautomatic rifle that has an ability to accept a *detachable magazine* and has at least one of the following characteristics: (i) a folding or telescoping stock; (ii) a pistol grip..., etc....” (Penal Law §265.00(22)(a)(*emphasis added*)).* The ARMagLock is designed to eliminate the threshold requirement that the rifle has the ability to accept a detachable magazine. Specifically, the ARMagLock product renders the magazine release mechanism of the rifle inoperable, unless the rear “takedown” pin of the receiver is removed, and the action of the rifle is manually split into an open position. Unless this is done, the magazine will remain fixed in place, and cannot be detached. The rifle will not be able to fire a round again until the action is subsequently closed, and at that point, any magazine that is inserted could not be ejected.

To better assist you in understanding what the ARMagLock product is and how it works, we invite you to take a look at the website <http://www.armaglock.com/>, as well as some of the video clips available online, which provide audio-visual information concerning this product offering.†

Under our reading of the SAFE Act, we believe that an AR-type rifle equipped with the ARMagLock product would be lawful to use and possess in New York State, even if it had one or more of the military features. Gun control legislation tends to be complex and technical, so one of the reasons we are writing to you is to educate you and your department about this product, in the event that you encounter individuals who have equipped their rifle with the ARMagLock device.

* The full list of banned characteristics reads as follows: “(i) a folding or telescoping stock; (ii) a pistol grip that protrudes conspicuously beneath the action of the weapon; (iii) a thumbhole stock; (iv) a second handgrip or a protruding grip that can be held by the non-trigger hand; (v) a bayonet mount; (vi) a flash suppressor, muzzle break, muzzle compensator, or threaded barrel designed to accommodate a flash suppressor, muzzle break, or muzzle compensator; (vii) a grenade launcher”

† Operation - <https://www.youtube.com/watch?v=AagWnQlaEaQ>; Installation <https://www.youtube.com/watch?v=F0nnd0Parco>

In the case of the NY SAFE Act, we note that the New York Legislature has left some room for confusion, as this Act uses terms such as “detachable magazine” and “fixed magazine,” but nowhere are these terms defined. Rightly or not, the SAFE Act has been criticized for a number of reasons[‡], and we believe that the failure to define these critical terms represents a significant oversight in this legislation. By failing to even attempt to offer a definition of what constitutes a “detachable magazine” (as other states *have done*[§]), we can only speculate about what types of modifications to a rifle will be deemed to comply with the law. It is noteworthy that every state that has included a definition of “detachable magazine” in their assault weapon legislation has specifically exempted magazines that can only be removed by disassembly of the firearm action (as with the ARMagLock), from their definition of this term.

Accordingly, we feel confident that owners of semi-automatic rifles equipped with the ARMagLock device are in compliance with the SAFE Act. If you have any question about whether we are correct in arriving at this conclusion, there is something you can do about it. The Solicitor General’s division of the New York Attorney General’s Office provides the service of offering legal opinions and guidance on matters requiring legal analyses^{**}. Unfortunately, this service is only available upon request from New York State agency officials and municipal attorneys, so we cannot petition the Solicitor General’s office directly to request an opinion letter. You are free to forward this information to your local municipal attorney, however, and request that he or she submit this matter to the office of the Solicitor General for legal opinion. Obtaining a clear answer to this issue is important to law enforcement and gun enthusiasts alike, accordingly we encourage you to consider pursuing this course of action.

If you do submit this information to the Solicitor General for an official opinion on the legality of the ARMagLock, we request that you please inform us via email so we may be of assistance if questions arise during the submission and/or analysis process. You may use the contact email address info@armaglock.com.

Thank you for taking the time to read this letter and become better informed about these nuances of the SAFE Act, and the potential solution ARMagLock provides.

Very Truly Yours,
LAW OFFICE OF MARC C. LARSON



Marc C. Larson, Esq.

[‡] <http://assembly.state.ny.us/mem/Ken-Blankenbush/story/50711/>

[§] See e.g., California Code of Regulations §5469(a) (“detachable magazine’ means any ammunition feeding device that can be removed readily from the firearm with neither disassembly of the firearm action nor use of a tool being required....”); Md. Code Ann., Crim. Law §4-301(f) (“Detachable magazine’ means an ammunition feeding device that can be removed readily from a firearm without requiring disassembly of the firearm action or without the use of a tool, including a bullet or cartridge.”), and; Connecticut General Statutes 53-202a(4) (“Detachable magazine’ means an ammunition feeding device that can be removed without disassembling the firearm action”).

^{**} See, <http://www.ag.ny.gov/appeals-opinions/introduction-opinions>

ARMagLock Product Brief

ARMagLock is a newly patented AR-15 fixed magazine solution. It potentially allows New York, California, Connecticut and other AR-15 owners to comply with existing and proposed fixed magazine laws, potentially avoiding assault weapon registration within their respective states. Stay compliant with the laws.

The ARMagLock turns your AR-15 or AR-10 into a "fixed magazine" firearm. Until you open the firearm action the magazine is locked or "fixed" as California and New York legislators mandate in their new laws. This means your magazine is not "detachable", therefore your firearm now potentially conforms to these states' existing "fixed magazine" laws.

To release the magazine, simply pull the rear takedown pin and open firearm action. Push the ARMagLock button to release magazine. Close the action and reinsert the takedown pin. Insert a new magazine and it is once again fixed in place.

See the following pages for images of the solution.

See our website for more information and legal disclaimers. <http://ARMagLock.com>





ARMagLock

**AR-15 FIXED
MAGAZINE LOCK
& RELEASE KIT**

MAY HELP TO
Avoid REGISTRATION*
WITH
ARMagLock



- Creates a fixed magazine rifle or pistol (AR-15 & AR-10)
- Operates similar to OEM magazine release button
- Easy installation and removability
- Made of aircraft grade aluminum

RIGHT SIDE MOUNT



* This is not a Department of Justice product.
Keep your guns safe and secure.