



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

MAY 22 2002

903050:RV
3311/2002-363

Ms. Beth Hays-Summers
Quolin International, Inc.
1331 N. Inyo
Ridgecrest, California 93555

Dear Ms. Hays-Summers:

This refers to the prototype Quolin Integral flare launcher that you have submitted for classification under the Gun Control Act. A .22 caliber starter pistol manufactured by New England Firearms has been used as the foundation for your flare launcher.

The New England Firearms (N.E.F.) starter pistol was previously evaluated and determined not to be a firearm as defined in Title 18, United States Code (U.S.C.) section 921(a)(3).

Evaluation of the submitted sample indicates that several modifications have been performed on the starter pistol. These modifications are:

1. The solid barrel has been removed.
2. A threaded rod has been installed through the front of the receiver in the location where the solid blank barrel was. The threaded tube is drilled out to .180 of an inch.
3. A large tubular barrel approximately 3 inches X 1.8 inches has been installed, offset from the threaded rod.
4. Inside the large barrel another barrel is screwed in place that is approximately 3.270 inches X 1.125 inches. This barrel has a knurled end.

Ms. Beth Hays-Summers

All of the added parts have been installed with roll pins.

The modifications performed on the N.E.F. .22 caliber blank starter gun do not modify the starter gun in any manner that would allow it to accept ammunition. Therefore, the Quoin Integral Launcher is not a firearm as defined in 18 U.S.C. section 921(a)(3).

Your letter and all accompanying technical drawings and information will be placed on file. Any deviation in the submitted plans could change the classification of the Quoin Integral Launcher.

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 black ink, appearing to read 'Curtis H.A. Bartlett', with a long horizontal flourish extending to the right.

Curtis H.A. Bartlett
Chief Firearms Technology Branch