

Author Full Name : Anonymous**Received Date :** 09/16/2022 12:01 AM**Comments Received :**

The changes to this form, from an actual Application to Make and Register a Firearm, under the NFA, to a combination form, that, in addition to being used to make and register a firearm, to also being a form to register the possession of an existing firearm, recently reclassified from a non NFA firearm, to a NFA firearm, is inappropriate, and the conditions set forth in same are unlawful.

To wit. The likely arm brace pistol into SBR registration period, that appears to be set for December, 2022, is not an application to "make" anything. The gun already exists. What your trying to do is accomplish a registration of certain firearms during December, 2022, like IRS form 4467 in 1968.

It would make more sense to have an amnesty specific form, as opposed to a form used to actually "make" a firearm, to avoid confusion between the two.

The amnesty form should also make clear, unlike an application to make or transfer, an amnesty registration must be approved, even if the possession is otherwise a violation of law. That is why the NFA has immunity provisions for amnesty registrants. Also, if state and local law is considered, it would do nothing but generate lawsuits, when, for instance, 10,000 Illinois SBR applications are disapproved, because IL generally prohibits SBRs, so ATF will not say an arm brace pistol is illegal in IL, despite no such actual law.

Also, NFA makers markings are not required for amnesty registered guns.

Likewise, CLEO info, fingerprints, and mug shots, were never required in prior amnestys

If this amnesty is going to take place, it should also include firearms reclassified under ATF rulings 81-4, 82-2, 82-8 that never had an actual registration period, as well as 94-1 and 94-2, since your doing it anyway. Notably, all of these "MGs" are pre 86 made for 922(o) does not apply.

also, if a photo of the gun is going to be required, there should be a place on the form to glue or tape it.

Finally, I suspect closer to 4 MILLION forms filed if such an amnesty is held, even if limited to arm braces. Only a fool would think the number would be in the twenty of thousands. I seriously doubt you have the logisitc ability to actually process the forms