

June 21, 2012

The Honorable Kamala Harris  
Attorney General, State of California  
1300 I Street  
Sacramento, CA 94244-2550

**Re: Urgent Request for Action Regarding “Bullet Button” Regulations**

Dear Attorney General Harris:

We, the undersigned gun violence prevention groups, write to urge you to take immediate action to revise California assault weapons regulations that currently allow the sale and possession of so-called “bullet button”-equipped assault rifles within the State of California in violation of the plain language of the state’s assault weapons law.

The bullet button is a feature that enables the firearm user to use a bullet or other pointed object to quickly detach and replace the weapon’s ammunition magazine. Because the use of a bullet or other “tool” is required to remove the magazine, current regulations have allowed the sale of these guns, even though the California assault weapons law explicitly prohibits weapons that have “the capacity to accept a detachable magazine.” As the recent letter to your office from Senators Steinberg and Yee persuasively articulates, the existing regulations conflict with the plain language of the state’s assault weapons ban.

The current regulations run counter to the intent of California’s assault weapons law and undermine its effectiveness. The bullet button facilitates precisely the sort of quick reloading – and potential for mass mayhem – that the California assault weapons ban prohibits. Moreover, since the regulations classify bullet button-equipped firearms as not having the capacity to accept a detachable ammunition magazine, these guns can incorporate virtually the full range of banned assault weapon features (folding or telescoping stock, flash suppressor, pistol grip, etc.).

The continued sale of firearms equipped with bullet buttons is the result of regulations adopted by the Department of Justice under another Attorney General. As a result, we believe it makes sense for your administration, with the rich technical expertise your staff possesses, to confront this issue through the regulatory process. However, time is also of the essence. As the attached catalog samples show, virtually every leading assault rifle manufacturer is now marketing so-called “California compliant” firearms with factory-installed bullet buttons.

**We urge you to promptly initiate the regulatory process to fix the state’s unlawful assault weapons regulations, which jeopardize the safety of Californians statewide.** Given the pressing nature of this issue and the limited time remaining in this legislative session, we respectfully request a response to this letter within one week so that we can fully assess our options.

A response to the undersigned may be directed to:

Juliet Leftwich  
Legal Director  
Law Center to Prevent Gun Violence  
268 Bush Street, #555  
San Francisco, CA 94104  
jleftwich@smartgunlaws.org

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Gross".

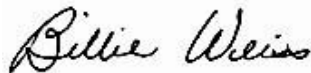
Dan Gross  
President  
Brady Center to Prevent Gun Violence

A handwritten signature in blue ink, appearing to read "Juliet A. Leftwich".

Juliet A. Leftwich  
Legal Director  
Law Center to Prevent Gun Violence (formerly Legal Community Against Violence)

A handwritten signature in black ink, appearing to read "Kristen Rand".

Kristen Rand  
Legislative Director  
Violence Policy Center

A handwritten signature in black ink, appearing to read "Billie Weiss".

Billie P. Weiss, MPH  
Founder  
Violence Prevention Coalition of Greater Los Angeles

CC: Senator Leland Yee, Senator Darrell Steinberg, Speaker John A. Pérez, Jessica Devencenzi,  
Stephen Lindley, Steven Meinrath, Gregory Pagan

Attached: Catalog samples of "California compliant" firearms with bullet buttons

# M&P<sup>TM</sup> 15 TACTICAL RIFLES

The M&P15 rifle line is Smith & Wesson's version of the popular semi-automatic AR-15 rifle. These rugged, lightweight rifles are built to perform flawlessly under varied conditions.



**A Model: M&P15OR**  
Optics Ready  
Product: 811003 - 16" Barrel  
5.56 mm NATO  
30 Round PMAG®



**NEW 2011**  
**B Model: M&P15ORC - Compliant**  
**Fixed Magazine & Bullet-Button\***  
Optics Ready  
Product: 151009 - 16" Barrel  
5.56 mm NATO - 10 Rounds  
Compliant For Sale in CA\*



**C Model: M&P15ORC - Compliant**  
**Fixed Stock**  
Optics Ready Compliant  
Product: 811013 - 16" Barrel  
5.56 mm NATO - 10 Rounds  
Compliant For Sale in CT, MA, MD, NJ, NY\*  
\*Compliance subject to change. Please check with your local dealer

\*Compliance subject to change.  
Please check with your local dealer

## M&P15OR and ORC Rifle Features

- Gas Block with Integral Picatinny-Style Rail
- QD Sling Swivel Attachment Point on Bottom of Gas Block

Model # Prod/SKU	Caliber	Action	Capacity	Overall Length	Stock	Sight Radius Barrel Length	Barrel Twist	Weight (No Mag)	Trigger Pull	Upper & Lower Material	Barrel Material	Chromed Components	Finish	Front Sight/ Rear Sight
<b>A</b> M&P15OR 811003	5.56 mm NATO	Gas Operated Semi Auto	30 Rds	35" Extd 32" Cllpsd	6-Position CAR	— 16"	1 in 9"	6.07 lbs.	7 lbs +/-	7075 T6 Aluminum	4140 Steel	Barrel Bore, Gas Key, Bolt Carrier	Hard Coat Black Anodized	— —
<b>B</b> M&P15OR 151009	5.56 mm NATO	Gas Operated Semi Auto	10 Rds	35" Extd 32" Cllpsd	6-Position CAR	— 16"	1 in 9"	6.07 lbs.	7 lbs +/-	7075 T6 Aluminum	4140 Steel	Barrel Bore, Gas Key, Bolt Carrier	Hard Coat Black Anodized	— —
<b>C</b> M&P15ORC 811013	5.56 mm NATO	Gas Operated Semi Auto	10 Rds	35"	Fixed	— 16"	1 in 9"	6.12 lbs.	7 lbs +/-	7075 T6 Aluminum	4140 Steel	Barrel Bore, Gas Key, Bolt Carrier	Hard Coat Black Anodized	— —

# M&P<sup>TM</sup> 15



# BULLET BUTTON RIFLES

## OUR BEST-SELLING RIFLES NOW SELLING EVERYWHERE.



DPMS now offers several of our most popular rifles with a Bullet Button fixed 10 magazine lower receiver. All customers should be familiar with the legalities of owning DPMS or AR style rifles in their State.



**DPMS .308/7.62-NATO**

**AP4 (BULLET BUTTON)**

RFTLR-AP4  
MSRP: \$999

Now, the best-selling rifle in the history of DPMS, has a higher caliber offspring. The DPMS .308 AP4, shown here in bullet-button configuration, ships with (1) fixed-10 round magazine.



**DPMS .223/5.56**

**AP4 (BULLET BUTTON)**

RFTLR-AP4  
MSRP: \$999

The best-selling rifle in the history of DPMS, the AP4 Carbine is trusted and proven on the field of battle by countless agencies.



# BULLET BUTTON

## BULLET BUTTON ORC ACR®



Bullet Button ORC ACR® (90893)

### FEATURES

- ORC (Optics Ready Carbine) configuration  
*(does not include flip up sights shown)*
- 16" M4 contour barrel with A2 flash hider
- Bullet Button lower receiver
- Tool required for magazine removal
- 10-round magazine



ORDER #	CALIBER	WEIGHT W/O MAG	OVERALL LENGTH	BARREL LENGTH	BARREL	MSRP	SHOWN ON PG
90877	5.56 NATO/223 Rem	7.9 lbs	38.2"	20"	4150 chrome-moly steel w/chrome-lined bore/chamber	\$1,414.80	23
90880	5.56 NATO/223 Rem	6.42 lbs	32.5"	16"	4150 chrome-moly steel w/chrome-lined bore/chamber	\$1,274.88	29
90883	5.56 NATO/223 Rem	8.46 lbs	38.2"	20"	4150 chrome-moly steel w/chrome-lined bore/chamber	\$1,150.50	24
90886	5.56 NATO/223 Rem	8.16 lbs	42.2"	24"	4150 chrome-moly steel w/chrome-lined bore/chamber	\$1,430.34	22
90888	5.56 NATO/223 Rem	6.42 lbs	32.5"	16"	4150 chrome-moly steel w/chrome-lined bore/chamber	\$1,111.63	29
90890	308 Win./7.62 Nato	7.9 lbs	35"	16"	4150 chrome-moly steel w/chrome-lined bore/chamber	\$1,476.99	20
90893	5.56 NATO/223 Rem	6.42 lbs	32.5"	16.5"	4150 chrome-moly steel w/chrome-lined bore/chamber	\$2,343.00	28

**SAME PERFORMANCE**  
**STATE-COMPLIANT**

## **BULLET BUTTON PATROLMAN'S CARBINE**



Bullet Button Patrolman's Carbine (90880)

### **FEATURES**

- A3 upper receiver with detachable carry handle
- 16" M4 contour barrel with A2 flash hider
- Bullet Button lower receiver
- Tool required for magazine removal
- 10-round magazine

## **BULLET BUTTON M4 TYPE ORC**



Bullet Button M4 Type ORC (90888)

### **FEATURES**

- A3 upper receiver with two 1 1/4" mini-risers
- 16" M4 contour barrel with A2 flash hider and low profile gas block
- Bullet Button lower receiver
- Tool required for magazine removal
- 10-round magazine