



## U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives**JAN - 4 2005**903050:RDC  
3311/2004-666

www.atf.gov

Mr. Len Savage  
President  
Historic Arms LLC  
1486 Cherry Road  
Franklin, GA 30217

Dear Mr. Savage:

This refers to your letter of July 14, 2004, to the Firearms Technology Branch (FTB), Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), regarding a semiautomatic variation of the Hungarian SGM 7.62x54R belt-fed machinegun that was submitted to FTB for examination and classification. Your prototype is designated "SGMB-SEMI" and is numbered "MK4". You have subsequently submitted an SGM machinegun parts set to assist in our examination and classification.

As you are aware, the **National Firearms Act (NFA), 26 U.S.C. § 5845(b)**, defines the term "**machinegun**" as—

*"...any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. This term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person."*

The Hungarian SGM is a variation of the Russian Goryunov 7.62x54R gas-operated, belt-fed medium machinegun. It has longitudinal barrel fins and, in lieu of the spade grips found on the Russian weapon, incorporates an RPD-type buttstock and trigger group assembly.

The sample was submitted to FTB as a belt-fed, closed-bolt firing, semiautomatic copy of the Hungarian SGM. It was noted that the receiver has been assembled from four fragments of a previously destroyed receiver. The condition of these fragments is representative of a receiver having been severed diagonally in three separate locations. The joints between these

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reassembled (rewelded) fragments are visible on the interior. A thin metal bar approximately 7-1/8 inches x 3/16 inch has been spot welded (in three locations) to the left interior wall. No other alterations or modifications were made to the reassembled receiver.

The FTB examination found that numerous modifications were made to the bolt and bolt carrier. The modifications to the bolt include the following:

- Installation of a firing pin approximately 4.265 inches long.
- Machining a shoulder approximately .209 inch x .192 inch on the lower left edge.
- Machining a shoulder approximately .129 inch x .125 inch on the lower right edge.

The modifications to the bolt carrier include:

- Reduction of the height of the post to approximately .301 inch.
- Machining a slot approximately .190 inch x .180 inch on left side.
- Reduction of the width to approximately .909 inch.
- Welding closed the recoil spring channel.

Also, the submitted sample features a striker plate (i.e., hammer), measuring approximately .906 inch x .909 inch x 1.937 inches, which is designed to interact with the sear in the trigger group. This part anchors the recoil spring and is slotted (approximately .190 inch x .180 inch) to bypass the bar within the receiver. It is positioned behind the bolt and bolt carrier, centered over the recoil spring guide.

Further, the trigger crosspin and sear crosspin are welded to the trigger housing, preventing their removal. The safety selector is not welded to the trigger housing, making its removal easy.

The modified bolt and bolt carrier and the improvised hammer mate with the receiver. The hammer is cocked by pulling the charging handle to the rear. The hammer is retained by the sear in the trigger housing. After ammunition is properly loaded and the weapon charged, the proposed firing sequence commences with the pulling of the trigger. This cycle is disrupted during recoil by the sear disconnecting from the trigger. The sear captures the hammer until the trigger is released and then pulled once again.

The FTB examination found that when the safety selector is removed, the sear does not disconnect from the trigger when the trigger is pulled. The net result of this condition is the failure of the sear to capture the hammer during the recoil cycle. Manual operation of the firearm indicated that the hammer, under pressure from the recoil spring, followed the bolt into battery and exerted pressure on the firing pin.

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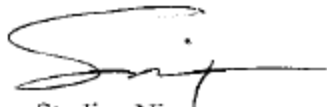
Upon further examination of the receiver, it seemed apparent that the only difference between the receiver of the submitted sample and that of an original SGM machinegun receiver was the thin metal bar placed on the sample's left interior wall. This bar was subsequently removed within 3 minutes using a punch and hammer. The burrs on the three weld joints were removed with a hand-operated Dremel tool in approximately 3-4 minutes. The original SGM machinegun bolt and bolt carrier (contained within the submitted parts set) were then installed into the submitted sample receiver. The comparative rapidity of these steps demonstrated that the reassembled sample receiver was a machinegun receiver having a minor modification.

In closing, based on the examination recounted above, FTB has found that your submitted "SGMB-SEMI" 7.62x54Rmm caliber firearm incorporates a frame or receiver of a machinegun. It is therefore a "machinegun" as defined in 26 U.S.C. § 5845(b). Since the submitted sample is an unregistered machinegun, it must be abandoned to ATF or destroyed.

Please provide FTB with instructions concerning disposition of this item within 60 days, or it will be considered abandoned and will be disposed of in accordance with the needs of the Government.

We thank you for your submission trust the foregoing has been responsive to your request for an evaluation.

Sincerely yours,



Sterling Nixon  
Chief, Firearms Technology Branch