



DIVISION OF LAW ENFORCEMENT
BUREAU OF FIREARMS
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February 11, 2022

Juggernaut Tactical
931 N. Parker Street
Orange, CA 92867

RE: Immediately Cease and Desist the Sale of "Featureless Series" Rifles—Including the F-9, F-10, and F-15 "Featureless" Rifles—Pursuant to Penal Code Section 30600

To Whom It May Concern:

The Department of Justice (the "Department") recently became aware that Juggernaut Tactical ("Juggernaut") has asked California firearm dealers to sell the "F-15 Featureless Rifle." It appears that the entire "Featureless Series" of rifles—including the F-9, F-10, and F-15 "Featureless" Rifles—are available for purchase on Juggernaut's website. Juggernaut's website describes each of these three rifles as including: "A newly-designed lower receiver [that] drops the exposed portion of the trigger, which allows you to keep a standard pistol grip while remaining featureless." (*See, e.g.,* <https://jtactical.com/products/113>.)

For the reasons explained below, the Department has determined that all three of Juggernaut's "Featureless Series" rifles are assault weapons under California Penal Code section 30515, subdivision (a)(1)(A). Accordingly, the manufacture, distribution, transportation, importation, keeping for sale, offering for sale, or exposing for sale of the "Featureless Series" rifles in California is prohibited under Penal Code section 30600, subdivision (a). A violation of this provision is a felony subject to a maximum punishment of eight years in prison. Moreover, the mere possession of a "Featureless Series" rifle in California is a misdemeanor pursuant to Penal Code section 30605, subdivision (a). To avoid a violation of these provisions, Juggernaut must no longer offer for sale its "Featureless Series" rifles to California residents on its website and cancel any pending transactions. Juggernaut must also cease encouraging licensed firearm dealers in California to sell its "Featureless Series" rifles. A separate bulletin will be sent to all California licensed firearms dealers instructing them not to process the sale of any Juggernaut "Featureless Series" rifle.

Penal Code section 30515, subdivision (a)(1)(A) describes one type of an assault weapon as a "semiautomatic, centerfire rifle that does not have a fixed magazine but has . . . : (A) A pistol grip that protrudes conspicuously beneath the action of the weapon." California regulations define a "pistol grip that protrudes conspicuously beneath the action of the weapon" as a "grip that allows for a pistol style grasp in which the web of the trigger hand (between the thumb and index finger) can be placed beneath or below the top of the exposed portion of the

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trigger while firing. This definition includes pistol grips on bullpup firearm designs.” (Cal. Code Regs. tit. 11, § 5471(z).)

The Department has concluded that all three rifles in the “Featureless Series”—the F-9, F-10, and F-15—fall within the plain language of these provisions. It is clear from pictures of these rifles on Juggernaut’s website that the pistol grip “*allows for a pistol style grasp* in which the web of the trigger hand (between the thumb and index finger) *can be placed* beneath or below the top of the exposed portion of the trigger while firing.” (Cal. Code Regs. tit. 11, § 5471(z), italics added.) Juggernaut’s website claims that this definition does not apply because the “proper way to grasp a pistol grip” is for the trigger hand to “be high on the grip.” (See <https://jtactical.com/f-series-development>.) If the trigger hand is high on the grip, so the website asserts, then it is not beneath or below the top of the exposed portion of the trigger. But the regulatory definition applies if the trigger hand *can be placed* beneath or below the top of the exposed portion of the trigger, regardless of where the trigger hand allegedly *should* be placed. And, Juggernaut’s website admits that “there are any number of ways one could hold a firearm’s pistol grip while firing in which the web of the hand falls below the top of the exposed trigger.” (See <https://jtactical.com/f-series-development>.) This can equally be said for the rifles in the “Featureless Series.” The description for each rifle in the “Featureless Series” even admits that each rifle “allows you to keep a standard pistol grip.” (See, e.g., <https://jtactical.com/products/113>.)

Juggernaut’s website acknowledges that Juggernaut is trying to effectively rewrite the applicable regulatory definition to make its “Featureless Series” rifles fall outside the definition of an assault weapon. The website claims that the regulatory definition’s use of “can be placed” “is not consistent with legislative intent.” (See <https://jtactical.com/f-series-development>.) Moreover, the website argues the definition should be rewritten to replace “allows” with “designed to allow,” and to replace “can be placed” with “intended to be placed.” (Compare Cal. Code Regs. tit. 11, § 5471(z) with <https://jtactical.com/f-series-development>.) But wishing the regulatory language was different does not make it so. Juggernaut’s website makes clear that the justification for the legality of its “Featureless Series” rifles is based on a regulatory definition that Juggernaut wishes existed, as opposed to the one that currently exists in law. The regulatory definition that Juggernaut is trying avoid indeed applies. Moreover, none of the “Featureless Series” rifles meet the regulatory definition of “featureless,” which “means a semiautomatic firearm (rifle, pistol, or shotgun) lacking the characteristics associated with that weapon, as listed in Penal Code section 30515.” (Cal. Code Regs. tit. 11, § 5471(o).)

Juggernaut’s attempt to explain how its “Featureless Series” rifles are not assault weapons also demonstrates that Juggernaut was fully aware of these provisions and intentionally designed these rifles in an attempt to do an end-run around Penal Code section 30515. (See, e.g., <https://jtactical.com/f-series-development>.) Juggernaut’s website also mentions that the Department “became aware of what [Juggernaut] intended to do in early December 2021. We have yet to receive any phone calls, in-person contacts, or a cease-and-desist order from them.” (See <https://jtactical.com/f-series-development>.) However, the Department has no record of receiving any alleged notice.

As previously stated, Juggernaut must immediately cease the manufacture, distribution, transportation, importation, keeping for sale, offering for sale, or exposing for sale of the

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“Featureless Series” rifles—including the F-9, F-10, and F-15 rifles—in California. The failure to do so could constitute a violation of Penal Code section 30600, subdivision (a).

In lieu of referring this matter for possible criminal prosecution or any other possible legal action, at this time the Department has instead decided to send this cease-and-desist letter. Accordingly, please respond to this letter by no later than February 22, 2022 and address how Juggernaut intends to: (1) immediately cease offering for sale on its website the F-9, F-10, and F-15 rifles; (2) immediately cancel all pending purchases of the F-9, F-10, and F-15 rifles from its website; (3) immediately notify anyone who has completed an online purchase of a F-9, F-10, and F-15 rifle and has been delivered the rifle that they are in violation of Penal Code section 30605, subdivision (a); and (4) immediately retrieve and recover all F-9, F-10, and F-15 rifles already delivered to any California firearms dealer or any other entity that would sell these rifles in California.

If you have any questions regarding the Department’s decision, please contact Deputy Attorney General Charlie Sarosy at Charles.Sarosy@doj.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Luis Lopez", written in a cursive style.

LUIS LOPEZ, Director
Bureau of Firearms

For ROB BONTA
Attorney General