



27201 Puerta Real, Suite 300, Mission Viejo, California 92691
Tel: 949-310-0817 / Fax: 888-624-4867 / CalGunLawyers.com

January 5, 2021

Trenton Irons d/b/a
Ashford Armament

Via E-Mail

Re: Ashford Armament Bolt Retention System (BRS)
Interrupted Firearm Action System

Dear Mr. Irons,

As described in the Confidential Attorney Client Memorandum provided concurrently with this letter, I have reached the following conclusion regarding the applicability of the California “Assault Weapon” laws to a firearm equipped with an Ashford Armament Bolt Retention System device. All but one of California’s definitions of “assault weapon” require the firearm to be “semiautomatic.” That one firearm type is non-existent on AR-15 platform firearms and therefore cannot have an Ashford Armament BRS properly installed upon the firearm. And, a firearm with a properly installed and properly functioning Ashford Armament BRS is not “semiautomatic” under the California Supreme Court’s definition, nor as defined by the California Department via underground regulations, nor as defined in the Department of Justice’s definition defined in 11 CCR §5471(hh).

Thus, it is our opinion that, since a firearm with a properly installed and properly functioning Ashford Armament BRS is not “semiautomatic,” it cannot properly be deemed an “assault weapon” under California law.¹

If you have any questions or concerns, do not hesitate to contact me at the number above.

Sincerely,
THE DAVIS LAW FIRM

s/ Jason Davis

JASON DAVIS

¹ This opinion is provided and based upon the laws in effect at the time of this letter and the information provided by you as the Client. California firearm laws are dynamic and subject to change. This letter is provided to Ashford Armament solely for their purposes and does not constitute general advice or generate any attorney client

relationship with any third parties who rely upon this letter.