

RICK VASQUEZ FIREARMS, LLC

CONSULTING SERVICES

Testimony of Rick Vasquez

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My name is Richard (Rick) Vasquez, and it a privilege to provide testimony today on proposed regulations and statutes pertaining to “homemade firearms.” I am very familiar with the issue of homemade firearms and the regulations pertaining to them.

As a firearms consultant I frequently represent the firearms industry and clients that are currently in the business of making ATF-approved non-firearms/non-weapons that are molded from plastic or cut from aluminum billets. It’s from this experience that I say that I am very concerned about how the ATF’s changed definitions and regulations will affect this industry.

My background, in a quick synopsis, is a 21- year career in the USMC. During that time, I served in Desert Storm and as a Detachment Commander on Embassy duty in Moscow Russia, which is the pinnacle of Embassy Duty. I also served as the chief instructor of the Marines precision weapons shop, and was responsible for introducing the Barrett .50 caliber sniper rifle to Marine Snipers during Desert Storm. After the USMC, I worked as a firearm instructor/trainer for Diplomatic Security Service. I was later employed by ATF where I worked as a Firearms Technology Expert until I retired.

While I was employed by ATF, I wrote the first formal Standard Operating Procedure for the Technology Branch. I traveled on numerous occasions through Mexico, Central America, Haiti, France, Canada, Australia, and numerous U.S. states where I provided training on firearms identification and trafficking. During these training events, we instructed tracing, and

I physically traced thousands of firearms.

As a firearms technology expert, I was the first person to bring both homemade firearms and 3D printing to the attention of ATF leadership. This is not a new issue; however, it is being used as an attention getter to give the ATF an opportunity to change regulations.

I assisted in developing the Advanced Firearms Identification Training for ATF's Industry Operations Investigators and while assigned to Firearms Operations Division, I was the technical expert that provided the expertise on a training program that provided knowledge on parts kit guns to all of ATF (2013).

I have read the proposed rulemaking and am concerned that these regulations do substantially more harm than good, and will do little to nothing to stop crime:

From my experience, most people who are putting homemade firearms into illegal commerce are convicted felons or persons that are criminals, and these new laws will not hinder them. It will only hinder law-abiding citizens who will respond the changed law. I believe there will be little to no effect on reducing crime by regulating these homemade firearms

If we want to stop crime, law makers and enforcers should be going after firearms traffickers—the criminals that have guns and sell them to other criminals—not law abiding citizens who choose to manufacturer them at home. We should spend more time and attention writing a anti-trafficking laws and providing enhanced firearms training to our Law Enforcement personnel, not regulating a lawful business.

Moreover, we need acknowledge that completing a firearm for personal use is not cost effective and is not as simple as it appears. These non-firearm castings and moldings have been properly classified by ATF and should not change. The primary effect of the new rule or other potential regulations treating these molds as firearms will be the removing of a hobby from law abiding citizens.

It appears that the main goal of this regulation and of lawmakers interested in this space is the application of a serial number to homemade firearms. In my opinion, this is not only unnecessary, it is the beginning of a form of registration.

In addition, the effect of the new rule on the firearms industry will be economically devastating. These are persons that have found a niche industry without having to be licensed. The new regulations will force them to be licensed, which will take away the market of law abiding citizens making their own firearms.

Finally, the trace data on quantity of homemade firearms traced in the proposed rulemaking is not supported by ATF's annual trace data. The numbers of homemade firearms traced in the proposed ruling is much higher than the number of homemade firearms in the 2019 annual trace.

In conclusion, I am here to provide testimony on homemade firearms and the effect it will have on the firearms industry and the lawful gun owner.

Richard Vasquez