



## U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Office of the Assistant Director  
*Enforcement Programs and Services*

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Washington, DC 20226

[www.atf.gov](http://www.atf.gov)

August 29, 2025

### **OPEN LETTER TO ALL FEDERAL FIREARMS LICENSEES REGARDING THE FRANKLIN ARMORY REFORMATION AND ANTITHESIS FIREARMS**

The purpose of this open letter is to advise all Federal firearms licensees (FFLs) that the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) is rescinding a prior Open Letter, dated December 19, 2019, regarding the Franklin Armory Reformation firearm (2019 Open Letter). This open letter also advises FFLs on the classification of the Franklin Armory Reformation and Antithesis firearms under federal law.

#### **Background**

Pursuant to the Settlement Agreement (Agreement) between the United States of America and the Firearms Regulatory Accountability Coalition and Franklin Armory, Inc., ATF is rescinding the 2019 Open Letter regarding the Franklin Armory Reformation firearm.

The 2019 Open Letter advised that the ATF Firearms and Ammunition Technology Division (FATD) examined the Reformation for the purposes of classification under the Gun Control Act (GCA) and the National Firearms Act (NFA).<sup>1</sup> FATD opined that the Reformation firearm was a shotgun subject only to the provisions of the GCA.<sup>2</sup> However, if the Reformation was equipped with a barrel less than 18-inches in overall length, that firearm would then be classified as a short-barreled shotgun (SBS).<sup>3</sup>

Separately, FATD examined the Antithesis firearm for classification under the GCA and the NFA. The Antithesis is a type of firearm that utilizes a 14.5-inch rifled barrel to fire .410 bore shotshells

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<sup>1</sup> FATD ultimately issued two determinations for the Reformation. As reflected in the 2019 Open Letter, FATD initially classified the Reformation as a short-barreled shotgun only under the GCA. However, FATD later reclassified the Reformation as a short-barreled shotgun under both the NFA and the GCA. The latter classification was vacated in *Firearms Regulatory Accountability Coalition, Inc., and Franklin Armory, Inc. v. Pamela Bondi*, No. 1:23-cv-00003 (D.N.D.). See Order Granting Plaintiffs' Motion for Summary Judgement and Denying Defendants' Motion for Summary Judgement at 23, ECF No. 60.

<sup>2</sup> See 18 U.S.C. § 921(a)(5).

<sup>3</sup> See 18 U.S.C. § 921(a)(6).

and slugs, in addition to .45 Colt cartridges. As such, FATD classified the Antithesis as a short-barreled rifle under both the GCA and the NFA.<sup>4</sup> This classification was vacated.<sup>5</sup>

### **Current Status of the Reformation**

Pursuant to the Agreement, “the Reformation is not a ‘short-barreled shotgun’ under 18 U.S.C. § 921(a)(6), ‘short-barreled rifle’ under 18 U.S.C. § 921(a)(8), or ‘firearm’ under 26 U.S.C. § 5845(a), and is not subject to the requirements of 18 U.S.C. § 922(a)(4) and 18 U.S.C. § 922(b)(4).” Furthermore, pursuant to the terms of the Agreement, “the Reformation is compliant with all applicable registration, taxation, or other requirements under the GCA and the NFA, and any such law incorporating by reference any such requirements.”

In other words, as a result of the Agreement, the Reformation is not a short-barreled shotgun, short-barreled rifle, nor is it an NFA firearm; therefore, (i) no NFA forms are necessary to sell, transfer, transport, deliver, or otherwise deal in or possess the Reformation, and (ii) no ATF Form 5320.20, Application to Transport Interstate or to Temporarily Export Certain National NFA Firearms, is necessary to transport the Reformation across state lines because the firearm is not subject to 18 U.S.C. § 922(a)(4) or (b)(4).

### **Current Status of the Antithesis**

As a result of the Agreement, the Antithesis is not a rifle, short-barreled rifle, nor is it an NFA firearm; therefore, (i) no NFA forms are necessary to sell, transfer, transport, deliver, or otherwise deal in or possess the Antithesis, and (ii) no ATF Form 5320.20, Application to Transport Interstate or to Temporarily Export Certain National NFA Firearms, is necessary to transport the Antithesis across state lines because the firearm is not subject to 18 U.S.C. § 922(a)(4) or (b)(4).

### **Sales and Transfers of the Reformation and Antithesis Firearms**

The Reformation and Antithesis are firearms under section 921(a)(3) of the GCA but are not rifles or shotguns pursuant to the agreement. When transferring these firearms, FFLs should utilize the “other firearm” box in block 24 on the ATF Form 4473.

Should you have any questions regarding this open letter, please contact the Firearms Industry Programs Branch at (202) 648-7190 or [FIPB@atf.gov](mailto:FIPB@atf.gov).

Sincerely,

**JENNIFER  
CICOLANI**

Digitally signed by  
JENNIFER CICOLANI  
Date: 2025.08.29  
13:09:08 -04'00'

Jennifer L. Cicolani, Assistant Director  
Office of Enforcement Programs and Services

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<sup>4</sup> Order Granting Plaintiffs’ Motion for Summary Judgement and Denying Defendants’ Motion for Summary Judgement at 6, *Firearms Regulatory Accountability Coalition, Inc., and Franklin Armory, Inc. v. Pamela Bondi*, No. 1:23-cv-00003 (D.N.D.), ECF No. 60.

<sup>5</sup> *Id.* at 23.