



**U.S. Department of Justice**  
Bureau of Alcohol, Tobacco,  
Firearms, and Explosives

*Office of the Director*

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*Washington, DC 20226*

June 15, 2026

**ATF Ruling 2026-2**

BolaWrap 150 under the GCA and NFA

**18 U.S.C. § 921(a)(3): DEFINITIONS (FIREARM)**

**26 U.S.C. § 5845(a): DEFINITIONS (FIREARM)**

**26 U.S.C. § 5845(e): DEFINITIONS (ANY OTHER WEAPON)**

**27 CFR § 478.11: DEFINITIONS**

**27 CFR § 479.11: DEFINITIONS**

*The BolaWrap 150 rescue and restraint tool is not a “firearm” or an “any other weapon” (AOW) as defined by the Gun Control Act (GCA), 18 U.S.C. § 921(a)(3), the National Firearms Act (NFA), 26 U.S.C. §§ 5845(a) and 5845(e), and their implementing regulations, 27 CFR §§ 478.11 and 479.11. The BolaWrap 150 is not a “firearm” under the GCA because it is not a “weapon.” Further, the BolaWrap 150 is not a “firearm” or an AOW under the NFA because it is neither a “weapon” nor the kind of weapon-like device that the NFA regulates.*

**Background**

The BolaWrap 150 is a hand-held, remote, non-lethal restraint tool that enables law enforcement officers to restrain subjects in a pain-free manner during law enforcement engagements. The BolaWrap 150 deploys a Kevlar tether to entangle a subject’s legs, arms, or torso, thus allowing officers to gain control without causing the subject pain, shock, or injury. For the following reasons, the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) has determined that the BolaWrap 150 is not a “firearm” or an “any other weapon” (AOW) under the Gun Control Act of 1968 (GCA) or National Firearms Act (NFA).

**Discussion**

The term “firearm” as defined by the GCA, 18 U.S.C. § 921(a)(3), in relevant part, means “(A)

any *weapon* (including a starter gun) which will or is designed to or may readily be converted to expel a projectile by the action of an explosive...” (emphasis added).

The GCA does not define the term “weapon.” However, the Supreme Court recently defined the term to refer to “an instrument of offensive or defensive combat . . . [such] as a club, sword, gun, or grenade.” *Bondi v. VanDerStok*, 145 S. Ct. 857, 867 (2025)(quoting Webster’s Third New International Dictionary 2589 (def. 1) (1966)); *see also id.* at 888 (Thomas, J., dissenting) (the word “weapon” was understood to mean “an instrument of offensive or defensive combat . . . something to fight with . . . something (as a club, sword, gun, or grenade) used in destroying, defeating, or physically injuring an enemy.”). ATF has also taken this approach historically. When determining whether an object was a “firearm,” ATF’s predecessor, the Alcohol and Tobacco Tax Division of the Internal Revenue Service, applied a similar definition of “weapon” under the Federal Firearms Act of 1938, Pub. L. 75–785, 52 Stat. 1250. *See Rev. Rul. 54-519*, 1954 WL 8590 (explaining that a toy pistol was not a firearm because “it is not considered to be a ‘weapon’ according to the commonly accepted definition of that term as an instrument of offensive or defensive combat”).

Based on the features of the BolaWrap 150, it is not an instrument of combat; rather, the BolaWrap 150 is merely an instrument of restraint. The Kevlar tether, which deploys at approximately 400–500 feet per second, is designed to minimize the risk of injury while the anchors are intended to engage with fabric rather than skin. In the event the barbs do strike the skin, the subject would incur minimal injury. The device is ineffective in employing deadly or non-deadly force on the subject for the purpose of debilitating a subject by pain or injury.

Accordingly, for the purposes of the GCA, the BolaWrap 150 is not a “weapon” and thus does not meet the definition of a “firearm” under 18 U.S.C. § 921(a)(3). *See, e.g., Rev. Rul. 54-519* (toy pistol that fired No. 6 shot is not a firearm because it is not an instrument of combat); ATF Ruling 2025-2, Importing Training Rounds (June 23, 2025) (training rounds do not cause death or serious bodily injury, nor are they likely to cause such injury, and they are ineffective for employing deadly or non-deadly force to injure an adversary; consequently, devices adapted to shoot only training rounds are not complete “firearms” under 18 U.S.C. § 921(a)(3)(A) because they are not instruments of offensive or defensive combat and training rounds are not “ammunition” under 18 U.S.C. § 921(a)(17)(A)).

Further, the BolaWrap 150 is not a statutory “firearm” under the NFA by virtue of being an “any other weapon.” Under the NFA, the term “firearm” includes an “any other weapon,” which is defined as “any weapon or device capable of being concealed on the person from which a shot can be discharged through the energy of an explosive.” 26 U.S.C. §§ 5845(a)(5), 5845(e). As discussed below, the BolaWrap 150 is neither a weapon nor the kind of weapon-like device that the NFA regulates.

In 1934, when Congress first passed the NFA, the term “firearm” included “any other *weapon*, except a pistol or revolver, from which a shot is discharged by an explosive if such weapon is capable of being concealed on the person.” Pub. L. 73–474, ch. 757, sec. 1(a), 48 Stat. 1236 (1934)(emphasis added). The legislative history indicates that Congress initially intended to regulate all concealable firearms, including handguns, but Congress ultimately decided to remove ordinary handguns from the NFA’s purview. 78 Cong. Rec. 11400 (1934) (statement of Rep. Doughton noting objections to the removal of pistols and revolvers from the legislation). As amended, the category of “any other weapons” was intended to regulate all other concealable firearms, except ordinary pistols and revolvers.

Under the 1934 Act, the BolaWrap 150 would not have been a statutory “firearm.” This is for the same reason that it is not a “firearm” for purposes of the GCA: the BolaWrap 150 is not a weapon because it is not an instrument of offensive or defensive combat.

The analysis, however, is more complicated because of a 1954 amendment to the NFA that has persisted to the present version. When Congress enacted the Internal Revenue Code in 1954, it amended the NFA to include “any weapon *or device* capable of being concealed on the person from which a shot can be discharged through the energy of an explosive, but such term shall not include pistols or revolvers or weapons designed, made or intended to be fired from the shoulder and not capable of being fired with fixed ammunition.” *See* Pub. L. 83–591, ch. 736, at 726, 68A Stat. 1 (1954) (emphasis added). The “or device” language remains in the present version. The NFA currently defines the term “any other weapon” to mean, in relevant part, “any weapon or device capable of being concealed on the person from which a shot can be discharged through the energy of an explosive . . .” 26 U.S.C. § 5845(e)(2024) (emphasis added).

Unlike the term “weapon,” which refers to instruments of combat, the term “device” is potentially extraordinarily broad. *See* Black’s Law Dictionary (11th ed. 2019) (defining a device as “an apparatus or an article of manufacture”); *see also* Merriam-Webster’s Collegiate Dictionary (11th ed. 2019) (defining a device to be “a piece of equipment or a mechanism designed to serve a special purpose or perform a special function”). The House Report accompanying the 1954 amendments to the NFA definition of “firearm” stated that Congress was largely trying to narrow the application of the NFA. The House Report complained that a hyper-literal reading of the 1934 NFA had resulted in the NFA being applied to “many weapons firing projectiles by the action of an explosive . . . although it is believed the Congress did not intend such weapons should be included,” such as certain antique guns. H.R. Rpt. 83-1337, at 395 (1954). The report did not explain, however, what prompted Congress to add “device” to the definition.

Although the term “device” could potentially be very broad, ATF believes it is best interpreted

by the principle of *noscitur a sociis*<sup>1</sup> to complement “weapon” by making it clear that the NFA encompasses all concealable firearms (other than pistols and revolvers), including some unusual and exotic gadgets that fire ammunition. Soon after the 1954 amendments were adopted, the Alcohol and Tobacco Tax Division held that the “‘Chicago Palm Protector’ is neither a pistol nor a revolver but a device capable of being concealed on the person from which a shot can be discharged through the energy of an explosive” and was therefore an AOW, as that term was understood by the NFA, as amended. Rev. Rul. 55-44. In 1956, the Alcohol and Tobacco Tax Division held that a wooden rat trap was an AOW when a barrel from which ammunition could be fired was added to it. Rev. Rul. 56-581. These rulings clarified that a “device” for purposes of an AOW included all contraptions with a concealed and embedded firearm, even if those contraptions had alternative uses as something other than a weapon.

By contrast, ATF has examined other devices not susceptible to use as weapons and determined they are not AOWs, despite their ability to be concealed on the person and to discharge a shot through the energy of an explosive. For instance, ATF has not classified propellant (powder) actuated nail guns as AOWs despite their use of an explosive charge to discharge a “shot.”<sup>2</sup> While not dispositive, many AOWs are weapons and devices “capable of firing normal ammunition with some likelihood that the projectile would go in the intended direction and not injure the user of the weapon.”<sup>3</sup> The BolaWrap 150 functions more similarly to devices not susceptible to use as weapons despite their ability to be concealed and to discharge something through the energy of an explosive.

ATF applies a similar analysis when classifying destructive devices under the NFA. ATF has long held that devices designed for expelling tear gas or pyrotechnic signals are exempt from the “destructive device” definition, unless possessed with “anti-personnel”-type ammunition or otherwise converted for use as a weapon. ATF is also unaware of any determination that such devices constitute AOWs, if concealable and not loaded with anti-personnel ammunition. *See* ATF Rul. 95-3, *Destructive Devices* (holding that 37/38mm gas/flare guns possessed with “anti-personnel” ammunition are destructive devices).

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<sup>1</sup> The principle of *noscitur a sociis* means “it is known from its associates.” In statutory construction, if two or more words are grouped together, the meaning of a particular word may be determined by reference to the meaning of the words surrounding it. *See* 82 C.J.S. Statutes § 422 (April 2026).

<sup>2</sup> Unlike the definition of “firearm” under the GCA, which requires the discharge of a “projectile” by the action of an explosive, an AOW must discharge a “shot” through the energy of an explosive. For purposes of classifying the BolaWrap 150, it is unnecessary to opine on whether a distinction exists between a “projectile” and a “shot,” and, if so, whether a tether, using pellets at the ends solely to ensure it wraps the subject, is a “shot” for the purposes of the NFA.

<sup>3</sup> *United States v. Brady*, 710 F. Supp. 290, 293 (D. Colo. 1989) (citing prior ATF Revenue Rulings 56-47 and 56-597 which held that devices are weapons because they are capable of firing shotgun ammunition to contrast the coyote getter – a thin metal tube using a .38 caliber primer to shoot a plastic cyanide pill into the coyote’s mouth – which is not an AOW because of, in part, the probability that the device would explode if fired with standard ammunition); *see also* ATF Open Letter, *Flare Insert – Any Other Weapon* (May 4, 2006) (concluding that Orion 25mm/12-gauge flare launcher equipped with an insert/sleeve that allows the use of conventional ammunition is an AOW).

In sum, ATF believes that the category of AOWs was meant to apply only to weapons and weapon-like devices that are injurious articles by firing a shot. This understanding is consistent with the 1954 House Report's admonition that the NFA was meant to cover "only such modern and lethal weapons, except pistols and revolvers, as could be used readily and efficiently by criminals or gangsters." H. Rpt. 83-1337, at 395. The BolaWrap 150 is not a weapon or weapon-like device that causes injury through firing a shot. The device is used to restrain and is an ineffective means for employing deadly or non-deadly injury on a subject during a law enforcement engagement. Given this, the device is not an "any other weapon" under the NFA.

*Held*, the BolaWrap 150, as currently designed, is not a "firearm" as defined by the GCA, 18 U.S.C. § 921(a)(3) and its implementing regulation, 27 CFR § 478.11 because it is not a "weapon."

*Held further*, the BolaWrap 150, as currently designed, is not a "firearm" or an "any other weapon" as defined by the NFA, 26 U.S.C. §§ 5845(a) and 5845(e) and its implementing regulation, 27 CFR § 479.11 because it is neither a "weapon" nor the kind of weapon-like device that the NFA regulates.

To the extent this ruling is inconsistent with any prior classification regarding the BolaWrap 150, this ruling hereby supersedes that prior classification.

Date approved: June 15, 2026

ROBERT  
CEKADA

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Robert Cekada,  
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