



FIREARMS DIVISION
P.O. BOX 160487
SACRAMENTO, CA 95816-0487
(916) 263-4887

July 20, 2005

Ken Friel
North American Arms, Inc.
2150 South 950 East
Provo, UT 84606-6285

Re: NAA .32 Guardian S; NAA .380 Guardian S

Dear Mr. Friel:

It has come to our attention that two firearms manufactured by North American Arms, the NAA .32 Guardian S and the NAA .380 Guardian S, which are currently approved for sale in California, may not have positive manually operated safety devices as required by California law.

California law prohibits the sale of "unsafe handguns" that lack certain safety features, or fail specified performance tests. Penal Code 12126(b)(1) specifies that a pistol without "a positive manually operated safety device, as determined by standards relating to imported guns promulgated by the federal Bureau of Alcohol, Tobacco and Firearms" is an "unsafe handgun." According to the Bureau of Alcohol, Tobacco and Firearms, a safety device that "must be engaged with the use of a tool...docs not qualify as a manually operated safety."

Based upon our initial examination of the NAA .32 Guardian S and the NAA .380 Guardian S, it appears that these two handguns both have safeties that must be engaged with the use of a tool, and therefore do not meet the requirements of Penal Code 12126(b)(1). If you believe that the handguns do have positive manually operated safety devices, please contact us in writing within 30 days of the date of this letter. If we do not hear from you within 30 days, or if we are not persuaded that the handguns have all of the safety features required by state law, we will remove them from the roster of handguns approved for sale in California.

If you have any questions, please feel free to call me at (916) 263-0802.

Sincerely,

A handwritten signature in black ink that reads "Alison Y. Merrilees".

ALISON Y. MERRILEES
Deputy Attorney General
Firearms Division