



February 4, 2016

Governor Nikki R. Haley  
1205 Pendleton Street  
Columbia, SC 29201

Dear Governor Haley,

My name is Tommy Teach and I am the CEO of BRUZER™ Less Lethal International in Elkhart, Indiana. We have designed and developed a 12-gauge less lethal launcher, the ML-12. The motivation for the design of this weapon was to preserve life wherever possible, offering an alternative to the lethal force too often used in close proximity situations. The ML-12 is capable of launching less lethal bean bag rounds, rubber bullets and rubber buckshot, distractionary rounds, and barricade rounds and was designed primarily for law enforcement and military use.

- **This product is a reliable option in escalation of force--something so much in the news and so obviously lacking in many of today's law enforcement operations.** One does not need to "go from zero to sixty." There MUST be an intermediate option between verbal commands and lethal force for the protection of both citizens and law enforcement professionals.
- **This launcher operates the in the same fashion as a standard pistol, but uses only proprietary less lethal ammunition.** This simplifies the necessary training, mitigates confusion and the possibility of cross-contamination with lethal rounds in tactical situations, and limits litigation and liability, ultimately cutting costs and helping to build positive relationships with the broader community.
- **This product is portable, easily maintained, and reliable in any climate or weather condition.** Unlike some of the other less lethal options currently in use today, tis launcher can be carried on an officer's vest or hip so that it is at hand when needed. There are no batteries, electronics or complex mechanics to be maintained. The effectiveness of the launcher is not impacted by heavy clothing, wet conditions, excessive heat, or excessive cold.

Unfortunately, there is a significant impediment to serving our customers in the law enforcement community. BRUZER's ML-12 less lethal launcher has been classified by the Bureau of Alcohol, Tobacco, Firearms, and Explosives (BATFE) as an AOW (Any Other Weapon) based on the bore diameter of the barrel (greater than 1/2 inch), not taking into account the fact that, with the proprietary plate, lethal ammunition cannot be loaded into the weapon. If a lethal round is loaded into the launcher, it cannot be closed and therefore cannot become operational. Flare guns, similarly, have a large bore diameter and are specifically designed for non-lethal use, but these products do not have similar limitations.

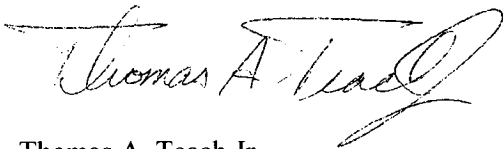
Based on the current classification, it takes at minimum 8 to 12 weeks for the BATFE to process the forms for law enforcement and military sales due to the Bureau's inefficient processes—and paperwork for citizen sales can take an incredible 8 months or more. While the ML-12 was initially designed with law enforcement use in mind, the demand and need for such a weapon in the civilian market is increasing rapidly in communities across the country as law enforcement response times grow longer and resources are stretched thin. Self-defense and defense of one's family is more and more the responsibility of the individual and a less lethal option is attractive for many.

Pressure from elected officials in combination with law enforcement—and the general public—is needed for the ML-12's classification to be changed and for this product to be purchasable using standard channels, background checks, and paperwork as one would with purchasing a typical pistol for lethal rounds from a store or manufacturer. In our correspondence to date, the BATFE has called BRUZER's ML-12 an "anti-personnel weapon", but this term is misused in an effort to support their earlier AOW ruling. The ammunition fired by the ML-12 is less lethal. How can that be considered "anti-personnel" when the primary aim of the design is to not kill? A standard handgun using 9mm rounds is considered an anti-personnel weapon—a lethal one—but because it simply has a smaller barrel bore diameter, it remains easily accessible to the general public while the ML-12 is set apart. We have spent endless hours trying to work with the BATFE in regards to their misclassification of the BRUZER as an AOW, but have to date received no meaningful response.

As we all know, the use of lethal force can be devastating to both the injured and the shooter. The mental and physical stress, financial impact, and social stigma placed on them and their families are heavy burdens to carry. BRUZER seeks to alleviate these very real costs and to save lives. We are currently unable to make the impact on the community that we wish to, offering law enforcement and citizens alike the opportunity to protect themselves without unnecessary lives lost because the BATFE does not want to reconsider its erroneous application of its own rules and terminology and address clearly the facts at hand. We would ask that you inquire after this matter and, if you feel it appropriate, offer your support for the reclassification of the BRUZER.

Thank you for your attention to this matter. Please feel free to contact me with any questions by phone or email at 866-694-4741 or [tteachjr@bruzerlesslethal.com](mailto:tteachjr@bruzerlesslethal.com), or at the address below.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas A. Teach Jr.", with a stylized flourish at the end.

Thomas A. Teach Jr  
Founder/CEO  
BRUZER Less Lethal International  
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