

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) STURON CORPORATION STEWARTS PAWN SHOP 113 W JEFFERSON LOUISVILLE, KY 40202, JEFFERSON	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 775045-2017-0109-B1B			
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">3. PERMIT/LICENSE NUMBER 461111027L01048</td> <td style="width: 33%;">4a. TARGET DATE 9/30/2017</td> <td style="width: 33%;">4b. TARGET HOURS</td> </tr> </table>	3. PERMIT/LICENSE NUMBER 461111027L01048	4a. TARGET DATE 9/30/2017	4b. TARGET HOURS
3. PERMIT/LICENSE NUMBER 461111027L01048	4a. TARGET DATE 9/30/2017	4b. TARGET HOURS		
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)			

6. ATF OFFICER(S) ASSIGNED
 (b)(6) Lead Investigator

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
 (b)(6), Area Supervisor, 11/25/2016

8. PURPOSE/SPECIAL INSTRUCTIONS
 Jefferson County compliance inspection focusing on awareness of possible straw purchases and trafficking of firearms.

9. INSPECTION RESULTS			<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC	10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	8	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS	52	NO. OF TECS HITS		2112 - P.O.A.	
NO. OF TAX ADJUSTMENTS		\$ VALUE OF TAX INCREASES		2113 - COMM. AIR	
		\$ VALUE OF TAX DECREASES		2114 - RENTAL CAR	
NO. OF ASSESSMENTS		\$ VALUE OF ASSESSMENTS		2115 - GPV EXPENSES	
NO. OF CLAIMS		\$ VALUE OF CLAIMS		2116 - MISC.	
NO. OF TAX PERIODS		\$ VALUE OF TAXES VERIFIED		TOTAL \$ FOR INSP.	

11. ATF OFFICER'S RECOMMENDATION
 Submitted by (b)(6) Senior Industry Operations Investigator

Submitted on: 04/24/2018
 On 8/2/2017, Senior Industry Operations Investigator (b)(6) commenced a compliance inspection at the business premises.
 See attached narrative for full details.

The electronic recordkeeping system in use at the time the inspection commenced was not in compliance with the parameters of ATF Ruling 2016-1. Licensee has brought the electronic recordkeeping system into compliance with the parameters of ATF Ruling 2016-1.

Recommend warning letter and recall inspection.
 Viols WL ONLY and Recall Inspection

12. TIME ACCOUNTING DATA

ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)
JUL 2017	1.00	
AUG 2017	65.00	
SEP 2017	2.00	
APR 2018	7.00	
ATF OFFICER'S SUBTOTAL	75.00	ATF OFFICER'S SIGNATURE
TOTAL HOURS	75.00	

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) STURON CORPORATION STEWARTS PAWN SHOP 113 W JEFFERSON LOUISVILLE, KY 40202, JEFFERSON	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) <p style="text-align: center;">775045-2017-0109-B1B</p> 3. PERMIT/LICENSE NUMBER 4a. TARGET DATE 4b. TARGET HOURS <p style="text-align: center;">461111027L01048 9/30/2017</p> 5. REQUESTED BY (SIGNATURE, TITLE AND DATE)
--	---

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

FFL compliance inspection conducted from 8/2/17 to 4/24/2018. Inspection stayed open so long due to the licensee implementing a new software program and replacing the old system. FFL was issued an ROV for 8 violations.

Final recommendation is ROV, WL and recall inspection. PII and warning letter sent out on 2/25/2019.

Viols WL ONLY and Recall Inspection

REVIEWED
 CONCUR
 SEE COMMENTS
 FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6) - Area Supervisor	REVIEW DATE 04/25/2018
---	---------------------------

ROUTING SEQUENCE AND DATE

- 1. _____
- 2. _____
- 3. _____
- 4. _____

CONTROL FILE POSTED DATE _____

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor STURON CORPORATION STEWARTS PAWN SHOP	Street Address 113 W JEFFERSON	City LOUISVILLE	State KY	Zip Code 40202-	County JEFFERSON	Page 1 of 6 Pages
License/Permit/Registry Number (If any) 461111020L01048	Expiration Date 11/1/2020	Date(s) or Period of Inspection 8/2/2017 through 4/24/2018				

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

- Number: 1**
- Nature of Violation:**
Failure to ensure compliance with an approved alternate method or procedure, i.e. ATF Ruling 2016-1.
- Citation:** 27 CFR 478.22(a)(3)
- Date Corrections to be Made:** (If not corrected immediately)
- Corrective Action to be Taken:** (If not corrected immediately) If licensee is unable to meet all requirements of ATF Ruling 2016-1, or any future ruling pertaining to electronic recordkeeping, licensee will discontinue use of the electronic recordkeeping system and maintain manual records.
-
- Number: 2**
- Nature of Violation:**
Failure to properly maintain the Acquisition and Disposition Record Book
- (b)(3) - 112 P. In instances, a firearm disposition was recorded though the firearm was in inventory.
 In instances, a firearm disposition was not recorded.
 In instance, the firearm serial number was not recorded.
 In instances, the firearm serial number was incorrect.
 In instance, the firearm caliber was incorrect.
 In instances, the disposition date was incorrect.
 In instances, the disposition date was not recorded.
 In instance, the book indicated that a firearm was not transferred because it was defective, however the firearm was not located on the business premises.
- Date Corrections to be Made:** 09/07/2017
(If not corrected immediately)
- Corrective Action to be Taken:** Licensee has amended the A&D Record Book to reflect the correct information. In the future, licensee will ensure that entries to the A&D Record Book are accurate and timely.

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor STURON CORPORATION STEWARTS PAWN SHOP	Street Address 113 W JEFFERSON	City LOUISVILLE	State KY	Zip Code 40202-	County JEFFERSON	Page 2 of 6 Pages
License/Permit/Registry Number (If any) 461111020L01048	Expiration Date 11/1/2020	Date(s) or Period of Inspection 8/2/2017 through 4/24/2018				

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

Citation: 27 CFR 478.125(e)

Number: 3

Nature of Violation:

Failure to obtain a properly completed ATF Form 4473.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken: In the future, licensee will ensure that ATF Forms 4473 are

(If not corrected immediately) accurate and complete prior to transferring the firearm.

2012 edition

(b)(3) - 112 P instance, the state of birth was not recorded in item #3.

(b)(3) - 112 P instance, a purchaser provided a "yes" answer to item #11c, which reads "Have you ever been convicted in any court of a felony or any other crime for which the judge could have imprisoned you for more than one year, even if you received a shorter sentence including probation?" The licensee proceeded with the transaction. Subsequent investigation found that the purchaser was not prohibited.

(b)(3) - 112 P instance, the country of citizenship was not recorded in item #14.

(b)(3) - 112 P instances, the date was incorrect in item #17.

(b)(3) - 112 P instance, the date was not recorded in item #17.

2016 edition

(b)(3) - 112 P instances, the date was incorrect in item #15.

(b)(3) - 112 P instances, the date was not recorded in item #15.

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor STURON CORPORATION STEWARTS PAWN SHOP	Street Address 113 W JEFFERSON	City LOUISVILLE	State KY	Zip Code 40202-	County JEFFERSON	Page 3 of 6 Pages
License/Permit/Registry Number (If any) 461111028L01048	Expiration Date 11/1/2020	Date(s) or Period of Inspection 8/2/2017 through 4/24/2018				

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

Citation: 27 CFR 478.124(c)(1)

Number: 4

Nature of Violation:

Failure to ensure proper completion of Section B, ATF Form 4473

2012 edition

Instance, the NICS response was not recorded in item #21d.

2016 edition

Instance, the NTN was incorrect in item #19b.

Instance, the date of NICS contact was incorrect in item #19a.

Citation: 27 CFR 478.124(c)(3)(iv)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken: In the future, licensee will ensure that ATF Forms 4473 are accurate and complete prior to transferring the firearm.
(If not corrected immediately)

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor STURON CORPORATION STEWARTS PAWN SHOP	Street Address 113 W JEFFERSON	City LOUISVILLE	State KY	Zip Code 40202-	County JEFFERSON	Page 4 of 6 Pages
License/Permit/Registry Number (If any) 461111026L01048	Expiration Date 11/1/2020	Date(s) or Period of Inspection 8/2/2017 through 4/24/2018				

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

- | | |
|--|---|
| <p>Number: 5</p> <p>Nature of Violation:
 Failure to properly complete Section D, ATF Form 4473
 2016 edition
 (b)(3) - 112 Public instance, the serial number was incorrect in item #26.
 instance, the type of firearm was incorrect in item #27.</p> <p>Citation: 27 CFR 478.124(c)(4)</p> | <p>Date Corrections to be Made: 08/21/2017
 <i>(If not corrected immediately)</i></p> <p>Corrective Action to be Taken: Licensee has made corrections to copies of the ATF Forms 4473 and has attached the corrected copies to the corresponding forms. In the future, licensee will ensure that ATF Forms 4473 are accurate and complete prior to transferring the firearm.
 <i>(If not corrected immediately)</i></p> |
| <p>Number: 6</p> <p>Nature of Violation:
 Failure to properly complete Section D, ATF Form 4473
 2016 edition
 (b)(3) - 112 Public instances, the date of transfer was incorrect in item #37.</p> <p>Citation: 27 CFR 478.124(c)(5)</p> | <p>Date Corrections to be Made:
 <i>(If not corrected immediately)</i></p> <p>Corrective Action to be Taken: In the future, licensee will ensure that ATF Forms 4473 are accurate and complete prior to transferring the firearm.
 <i>(If not corrected immediately)</i></p> |

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor STURON CORPORATION STEWARTS PAWN SHOP	Street Address 113 W JEFFERSON	City LOUISVILLE	State KY	Zip Code 40202-	County JEFFERSON	Page 5 of 6 Pages
License/Permit/Registry Number (If any) 461111020L01048	Expiration Date 11/1/2020	Date(s) or Period of Inspection 8/2/2017 through 4/24/2018				

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

Number: 7

Nature of Violation:

Failure to ensure ATF Form 4473 was properly completed.

2012 edition

(b)(3) - 112 P01 instances, the type of firearm was incorrect in item #18.
instance, the number of firearms transferred was not recorded in item #30a.
instance, item #30b was not completed.

2016 edition

(b)(3) - 112 P01 instance, the number of firearms transferred was incorrect in item #29.
instances, item #30 was not properly completed.

Citation: 27 CFR 478.21(a)

Date Corrections to be Made: 08/21/2017

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee has made corrections to copies of the ATF Forms 4473 and has attached the corrected copies to the corresponding forms. In the future, licensee will ensure that ATF Forms 4473 are accurate and complete prior to transferring the firearm.

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor STURON CORPORATION STEWARTS PAWN SHOP	Street Address 113 W JEFFERSON	City LOUISVILLE	State KY	Zip Code 40202-	County JEFFERSON	Page 6 of 6 Pages
License/Permit/Registry Number (If any) 461111028L01048	Expiration Date 11/1/2020	Date(s) or Period of Inspection 8/2/2017 through 4/24/2018				

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

Number: 8

Nature of Violation:

Failure to prepare and submit ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolver ^{(b)(3) - 112 P} instance.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee has submitted the ATF Form 3310.4. Licensee will ensure that ATF Form 3310.4 is completed and submitted by close of the business day in any case where 2 or more handguns are transferred to a non-licensee within a 5 business day period. Licensee will ensure that copy 1 is forwarded to ATF, copy 2 is forwarded to the local law enforcement agency and copy 3 is attached to the corresponding ATF Form 4473.

Citation: 27 CFR 478.126a

I Have Received a Copy of This Report of Violations (Proprietor's signature and title)

Signature and

(b)(6)

Manager

IVI

Date

4/24/18

Date

4/24/18



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Louisville Field Division

600 Dr. Martin Luther King Jr. Place, Suite 500

Louisville, KY 40202

www.atf.gov

775045: (b)(6)
5370

April 25, 2018

WARNING LETTER

Mr. Jeremy Stein
Sturon Corporation
d/b/a Stewart's Pawn Shop
113 W. Jefferson St.
Louisville, KY 40202

Re: Federal Firearms License Number: 4-61-111-02-0L-01048

Dear Mr. Stein:

As a result of a recent compliance inspection conducted by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) at your firearms business located at 113 W. Jefferson St., Louisville, KY 40202, on 8/2/2017 through 4/24/2018, you were cited for violations of 27 Code of Federal Regulations, Part 478. The violations were discussed with you during the inspection. A copy of the Report of Violations, ATF Form 5030.5, issued at the time of the inspection is enclosed.

All violations were fully explained to you by ATF Industry Operations Investigator (b)(6). You indicated that you understood the requirements of the firearms laws and regulations as a licensee. You further indicated that corrective actions would be taken to eliminate future violations.

The records you are required to maintain and the business operations you conduct are important to law enforcement in our continuing efforts to reduce violent crime and protect the public. It is essential that you comply with all Federal laws and regulations that govern your firearms

Mr. Jeremy Stein
Sturon Corporation d/b/a Stewart's Pawn Shop

business. ATF appreciates the efforts you and other industry members make in this area, and we look forward to continuing to work with you in that regard.

You are reminded that retention of your Federal firearms license is conditional upon compliance with Federal laws and regulations. Because the violations cited in this most recent inspection were fully explained to you and you stated you understood your compliance responsibilities as a licensee, any future violations, either repeat or otherwise, could be viewed as willful and may result in the revocation of your license. Please ensure that future compliance is achieved.

Should you have any questions regarding this matter, please contact Industry Operations Investigator (b)(6)

Sincerely,

(b)(6)

Louisville II Area Supervisor

cc: Federal Firearms Licensing Center
Louisville II Area Office

Enclosure

FIREARMS INSPECTION REPORT

Name: Sturon Corp
Trade Name: Stewart's Pawn Shop

UI#: 775045-2017-0109-B1B
FFL#: 4-61-111-01-7L-01048

Address: 113 W. Jefferson
Louisville, KY 40202

1 - Introduction

Inspection Profile:

On 8/2/2017, Senior Industry Operations Investigator (b)(6) commenced a compliance inspection at the business premises. Store employees stated that owner/operator Jeremy Stein was on vacation in Europe and was not expected back at the business premises until 8/10/2017. Manager Jen from the Broadway location stated that she was working at the Jefferson St. location until Mr. Stein returned from Europe.

On 8/11/2017, Investigator (b)(6) met with Jeremy Stein at the business premises. Mr. Stein was identified via his Kentucky driver's license (b)(6) (b)(6)

The inspection period covered the timeframe from 8/2/2016 through 8/1/2017.

Business Profile:

Sturon Corp d/b/a Stewart's Pawn Shop has been licensed as a dealer of firearms since November 2002. The business conducts pawnbroking operations and also buys and sells used handguns and long guns. In addition, the business offers transfer services for individuals who purchase firearms through firearms auction websites and accepts firearms for consignment. Licensee also sells ammunition and accessory items such as holsters. Licensee does not conduct business at gun shows and other authorized extensions of the business premises.

During the inspection period, licensee acquired approximately (b)(4) firearms and disposed of approximately (b)(4) firearms. There is no off-site storage of firearms.

Sturon Corp also operates a second pawn shop, located at 1133 W. Broadway, Louisville, KY 40203 (FFL #4-61-08868, last inspected 12/2015). Licensee is in compliance with local zoning requirements and holds pawnbroker license number 4947 with the City of Louisville.

Ownership and Control:

Sturon Corp is a corporation, organized in 1971 in the state of Kentucky and is currently in good standing (see Exhibit #1).

FIREARMS INSPECTION REPORT

Name: Sturon Corp
Trade Name: Stewart's Pawn Shop

UI#: 775045-2017-0109-B1B
FFL#: 4-61-111-01-7L-01048

Variance:

Licensee does not have any variances on file and did not request any variances during the inspection. The prior recordkeeping variance was superseded by ATF Ruling 2016-1.

2 - Recommendation

Violations, Warning Letter, recall inspection

3 - Inspection History

Date of Inspection: 5/8/2011
Type of Inspection: Compliance
UI#: 775045-2011-0138-B1B
Inspection Results: Report of Violations
Cited Violations: 27 CFR 478.124(c)(3)(i) – Failure to record the expiration date for the identification document.
27 CFR 478.125(e) – Failure to record [REDACTED] dispositions.

Date of Inspection: 4/16/2007
Type of Inspection: Compliance
UI#: 775045-2007-0136-B1B
Inspection Results: Warning Letter
Cited Violations: 27 CFR 478.124(c)(3)(i) – Failure to record identification information.
27 CFR 478.124(c)(3)(iv) – Failure to record NICS contact information.
27 CFR 478.124(c)(4) – Failure to record firearm information.
27 CFR 478.21(a) – Failure to record required information in items 18, 25, 31, 32.
27 CFR 478.22 – Failure to obtain a recordkeeping variance.

4 - Acquisition & Disposition (A&D) Record - Inventory

Licensee maintains an electronic Acquisition and Disposition (A&D) Record Book for all firearms.

On 8/2/2017, Investigator (b)(6) conducted a physical inventory of all firearms on the business premises. Jen provided a listing of the firearms purportedly in inventory (see Exhibit #2). Employee (b)(6) provided inventory assistance when needed. A total of 341 firearms were located on the business premises. The A&D Record Book contained [REDACTED] open entries. [REDACTED] open entries remained after comparison of the physical inventory to the A&D Record Book and ATF Forms 4473 for which dispositions had not yet been recorded into the A&D Record. In addition, [REDACTED] located on the business premises did not have a corresponding open entry in the A&D Record Book (see Exhibit #3). Instead, each entry contained a disposition. Jen stated that when a

FIREARMS INSPECTION REPORT

Name: Sturon Corp
Trade Name: Stewart's Pawn Shop

UI#: 775045-2017-0109-B1B
FFL#: 4-61-111-01-7L-01048

customer pays to acquire a firearm from pawn, the computer system automatically enters a disposition for the firearm showing the date the loan was paid in full. If the NICS check returns a delay or a deny response, the disposition remains as the date the loan was paid. Once the customer takes delivery of the firearm or their money is refunded and the firearm relinquished to the business, the disposition date is amended to reflect the actual date of transfer. Jen could not provide specific details for why this occurs, only stating that it is the same for both locations. She also could not provide additional details such as whether the system tracks such changes.

On 8/3/2017, [REDACTED] of the remaining open entries was reconciled via a completed Form 4473 (see Exhibit #3a). [REDACTED] firearm still could not be located, though Jen was able to determine that the firearm had been sold to the Broadway location on 7/26/2016. A search of the records also determined that the individual who originally pawned the firearm "lost it in pawn" on 8/10/2013. Jen and other employees commenced a search of ATF Forms 4473 dated 8/10/2013 through 7/25/2016 but did not find any forms containing the firearm in question. On 8/11/2017, Jeremy provided documentation showing that the firearm had been transferred from the Jefferson St. store to the Broadway store on 2/22/2016 (see Exhibit #3b)

Upon completion of the inventory, it was also determined [REDACTED] serial numbers were incorrect in the A&D Record Book and 1 serial number was not recorded in the A&D Record.

Investigator [REDACTED] requested a printout of the entire A&D Record Book, but Jen could not determine how to print or create a computer file for Investigator [REDACTED] use. On every attempt, the computer would produce an error message stating that the file could not be created or printed. Jen stated that Jeremy would need to provide the remaining information upon his return. Investigator [REDACTED] left a note for Mr. Stein indicating she would return to the business premises on Friday, 8/11/2017, to continue the inspection.

On 8/11/2017, Investigator [REDACTED] explained to Mr. Stein the concerns regarding the electronic recordkeeping system. Mr. Stein stated that the electronic system in place is over 30 years old and is unable to be updated or fields amended. He stated that there was no way to track changes made to the records, no way to "tweak" individual parts of the program and no way to make any other changes to the system. He stated that even the IT firm (Louisville Geek) the business has hired for other computer applications "will not touch the system because it is so old and outdated." Mr. Stein stated that the only remedy he is aware of is replacement of the entire system. He expressed apprehension about this, stating that "some people aren't very receptive to technology." Investigator [REDACTED] provided Mr. Stein with a copy of ATF Ruling 2016-1 and explained that the electronic recordkeeping system must be able to meet all the requirements of the ruling in order to be used. She further stated that the company would not be able to request a variance based upon the current electronic system because ATF would not approve any system where dispositions are recorded even

FIREARMS INSPECTION REPORT

Name: Sturon Corp
Trade Name: Stewart's Pawn Shop

UI#: 775045-2017-0109-B1B
FFL#: 4-61-111-01-7L-01048

though the firearm remains in inventory. Mr. Stein demonstrated how even if all of the disposition data is removed, the system automatically re-enters the date of payment in the disposition section. Mr. Stein also stated that there is no tracking for corrections to the system. Mr. Stein stated that he would discuss with other members of the business acquiring new computer system software.

On 8/11/2017, Mr. Stein provided a full copy of the A&D Record Book on a thumb drive (see Exhibit 3c). In reviewing the record it was determined that several disposition dates were missing and several more were incorrect. In addition, [REDACTED] disposition entry indicated that the firearm in question was not transferred to a customer because the firearm was defective. There was no other acquisition or disposition entry for the firearm, and the firearm was not located in the physical inventory. Investigator (b)(6) provided Mr. Stein with a listing of these discrepancies and requested that he obtain documentation showing where and when the firearms were disposed.

On 8/14/2017, Investigator (b)(6) returned to the premises. Jeff Stein was at the business premises and stated that Jeremy was expected within 30 minutes. Investigator (b)(6) inquired as to whether Jeremy and Jeff had discussed the issues with the electronic recordkeeping system. Jeff stated that they had and that obtaining a new electronic recordkeeping system for the business would cost "between \$20,000 and \$30,000." He inquired as to why the current system does not meet the requirements. Investigator (b)(6) explained the issue with the delay/deny transactions as well as tracking of corrections. Jeff stated that he was not sure how the Broadway location handles such transactions and telephoned Jen to inquire as to the procedure followed. Upon completion of his call, he stated that Jen had said the firearm is entered as a new acquisition with a new P or B number, and the original entry is provided a disposition that states the firearm was re-recorded on another line. Jeff stated that he did not know the specifics of how it all transpires since Jen is in charge of that but would have her contact Jeremy to provide detailed instruction on the process.

On 8/14/2017, Investigator (b)(6) provided Jeremy Stein with a listing of the remaining A&D Record Book errors. Mr. Stein and Investigator (b)(6) agreed that the items should not be corrected within the computer system until it is determined how changes are or can be tracked. However, Investigator (b)(6) requested that ATF Form 4473 corrections be made not later than 8/21/2017. In addition, Investigator (b)(6) requested that the business come to a determination on how the electronic recordkeeping system issues would be resolved not later than 8/21/2017. Due to the lengthy delay in accomplishing updates to the current electronic recordkeeping system to bring it into compliance with ATF Ruling 2016-1, Investigator (b)(6) contacted Jeremy Stein on 9/27/2017 and requested he make corrections to the A&D Record. She explained that since Jeff Stein had stated he was in the process of obtaining new software, correction of the record now would ensure a smoother transition and keep the business from having to make corrections after the firearm information was transferred to the new system. On 9/28/2017, Jeremy Stein made all required corrections (see Exhibit #12).

FIREARMS INSPECTION REPORT

Name: Sturon Corp
Trade Name: Stewart's Pawn Shop

UI#: 775045-2017-0109-B1B
FFL#: 4-61-111-01-7L-01048

On 8/23/2017, Investigator (b)(6) spoke with Jeff Stein. Mr. Stein stated that the business had made policy changes and would now not accept final pawn payment until the ATF Form 4473 is completed and the NICS background check complete. He stated that this change in policy would ensure that a disposition is not recorded in cases where the NICS response is delayed or denied. As to the track changes requirement, Mr. Stein stated that the IT firm he is working with is exploring the possibility of adding a separate change field that could be completed in cases where any changes are made to the A&D Record. He stated that since the technician in charge has a "day job" it may be "a week or two" before he is able to determine if such change is possible. Investigator (b)(6) requested that Mr. Stein provide an update not later than 9/7/2017. On 9/7/2017, Jeff Stein contacted Investigator (b)(6) and stated that the IT firm had completed the software fix at the Broadway location but not the Jefferson location. He stated that it would be at least another week before the changes could be made to the system because the IT firm was located in Florida and all personnel were under a mandatory evacuation order due to Hurricane Irma. Investigator (b)(6) requested Mr. Stein contact her on 9/12/2017 with a status update. On 9/13/2017, Mr. Stein contacted Investigator (b)(6) and stated that the IT firm was still without power and unable to complete the system corrections until at least 9/20/2017. Investigator (b)(6) requested that Mr. Stein provide a status update no later than 9/20/2017. On 9/21/2017, Mr. Stein contacted Investigator (b)(6) and stated that he was in the process of obtaining new software and hardware for the Jefferson St. location. He stated that the operating system (Windows XP) will not support the changes that are needed. He stated that he would be contacting Dell on 9/25/2017 to determine a delivery date for the hardware. He further stated that he was unable to contact the supplier any earlier due to his observance of a religious holiday 9/21/2017 through 9/22/2017. Investigator (b)(6) requested that Mr. Stein provide a status update not later than 9/26/2017.

On 9/26/2017, Investigator (b)(6) contacted Mr. Stein to request a status update. Mr. Stein stated that he was in the process of acquiring a new software package (Pawn Master) and new hardware, investing between \$20,000 and \$30,000. He stated that he did not have a timeframe for completion. Investigator (b)(6) reminded Mr. Stein that if the business could not meet the parameters of the ATF Ruling, the company would need to revert to written records until such time that the recordkeeping system can be brought into compliance. Mr. Stein became irate and stated that ATF had never told him during any inspection that the system was not in compliance with the recordkeeping rulings. He stated that it was the same system in place since 1990 and that the company had been given permission to use the system. Investigator (b)(6) explained that the electronic recordkeeping rulings had superseded the variance issued in 2007. Mr. Stein asked how he was supposed to know that since ATF had never told him. Investigator (b)(6) again explained that the electronic recordkeeping rulings superseded any previously issued recordkeeping variances. She directed him to ATF Ruling 2016-1 and reiterated that any electronic recordkeeping system must be in compliance with the parameters of the ruling. Mr. Stein asked if the business was considered to be

FIREARMS INSPECTION REPORT

Name: Sturon Corp
Trade Name: Stewart's Pawn Shop

UI#: 775045-2017-0109-B1B
FFL#: 4-61-111-01-7L-01048

“grandfathered” since the computer system had been in use for such a long time. Investigator (b)(6) stated that the business could not be “grandfathered” and that the electronic recordkeeping system must be in compliance with ATF Ruling 2016-1 or a manual record kept. Mr. Stein again expressed his displeasure but stated that he would contact Investigator (b)(6) by 9/28/2017 with a timeframe determination.

On 9/29/2017, Jeff Stein informed Investigator (b)(6) that he was in the process of arranging replacement of the current electronic firearm acquisition and disposition recordkeeping system. Mr. Stein stated that the business would be acquiring PawnMaster software as well as a new hardware package that will support the new software. He estimated that the new electronic recordkeeping system would be installed and operational by 11/15/2017. The business was afforded until 11/17/2017 to bring the electronic firearms acquisition and disposition recordkeeping system into compliance with ATF Ruling 2016-1. A subsequent letter forwarded to Mr. Stein stated that failure to bring the electronic recordkeeping system into regulatory compliance by 11/17/2017 would require the business to revert to a manually written A&D Record Book and/or may require the business to cease acquiring and disposing of firearms until such time that the electronic acquisition and disposition records are in compliance (see Exhibit #13).

On 11/29/2017, Investigator (b)(6) attempted to contact Jeff Stein. A message was left with manager Jennifer. The call was not returned.

On 11/30/2017, Investigator (b)(6) again attempted to make contact with Mr. Stein. Another message was left with Jennifer. Mr. Stein returned the call. He stated that the computer technicians have been unable to transfer data between systems and run the new package without significant glitches. He stated that this was due to the age of the computer equipment. He further stated that the computer technicians were confident that the system could be “bug-free” and operational by mid-January. Investigator (b)(6) reminded Mr. Stein that he had stated the system would be operational by mid-November. She also reminded him of the stipulation in the letter from 10/3/2017 that the business may have to revert to a manual record if the electronic system was not in compliance by 11/17/2017. Investigator (b)(6) requested that Mr. Stein forward an email detailing the continuing issues with the computer system and the expected date of implementation. She also informed Mr. Stein that Area Supervisor (b)(6) would contact him to discuss the situation. Investigator (b)(6) received the email from Mr. Stein on 12/1/2017 (see Exhibit #14). She forwarded the email to AS (b)(6) for review.

On 12/28/2017, AS (b)(6) stated through email that he had contacted Jeff Stein regarding the electronic recordkeeping system (see Exhibit #15). According to AS (b)(6), Mr. Stein indicated that the business paid \$12,500 to have PawnMaster software installed at both the Broadway and Jefferson Street locations, with final upgrade cost for new hardware and software expected to be over \$25,000. The Jefferson Street location is expected to begin use in early to mid-January, with the Broadway location expected

FIREARMS INSPECTION REPORT

Name: Sturon Corp
Trade Name: Stewart's Pawn Shop

UI#: 775045-2017-0109-B1B
FFL#: 4-61-111-01-7L-01048

to follow in April. Jeff Stein attributed delays to the current software being so old that PawnMaster had to write new code to properly transfer the old data to the new system. Mr. Stein reportedly sent employees to another pawn shop to receive instruction on operating PawnMaster software, and the business is expected to continue working with Louisville Geek and PawnMaster to ensure any new hardware is capable of running the PawnMaster software. Mr. Stein stated that the conversion to the new system would likely not occur before mid-January. AS (b)(6) instructed Mr. Stein to contact him when the upgrade begins.

On 1/23/2018, Jeff Stein contacted AS (b)(6) to inform him that the PawnMaster software was installed and data migration had begun (see Exhibit #16). Over the subsequent 2 ½ months, Mr. Stein did not provide any status updates for the electronic recordkeeping system.

On 4/16/2018, Investigator (b)(6) contacted Mr. Stein to request a status update for the electronic recordkeeping system. Mr. Stein stated that the Jefferson Street location was "up and running." He further stated that he was positive he had contacted the Louisville Area Office several weeks ago. He stated that he had left a message for AS (b)(6) attesting to the completion of data migration at the Jefferson Street location. He stated that Jeremy Stein was currently on vacation and would be returning 4/21/2018.

On 4/23/2018, Investigator (b)(6) contacted Jeremy Stein regarding scheduling of the closing conference. She explained that the visit would include a demonstration of the electronic recordkeeping system. The closing conference was scheduled for 4/24/2018.

On 4/24/2018, Investigator (b)(6) observed the updated electronic recordkeeping system. The business has installed the Pawn Master Classic software package onto newly acquired hardware (see Exhibit #17). The electronic recordkeeping system is in compliance with the parameters of ATF Ruling 2016-1. Jeremy Stein is in the process of ensuring that the former electronic recordkeeping system contains disposition information indicating the information transfer to the new system.

Jeremy Stein provided documentation to reconcile (b)(6) of the transactions from the list provided on 8/11/2017 (see Exhibit #9). However, there was still no resolution for a transfer of (b)(3) - 112 Public Law 55 125 Stat 552. The A&D Book indicated that the firearm was defective and not transferred to the individual who was to take delivery. The firearm is not currently in inventory, and there is no indication that the firearm was transferred. Jeremy Stein provided documentation showing the firearm was received by the Broadway location on 8/28/2014 from (b)(6). He surmised that the firearm was taken by an employee from the Jefferson St. location to the Broadway location for repair and was mistakenly entered as being received from (b)(6) since (b)(6) was the intended recipient. However, there is no documentation to prove this, and the ATF Form 4473 clearly states that the firearm was not transferred to (b)(6) on 8/28/2014. Since the Broadway location did show in their A&D

FIREARMS INSPECTION REPORT

Name: Sturon Corp
Trade Name: Stewart's Pawn Shop

UI#: 775045-2017-0109-B1B
FFL#: 4-61-111-01-7L-01048

Record Book an acquisition date of (b)(3) - 112 Public Law 55 125, a disposition was recorded indicating transfer to (b)(3) - 112 Public Law 55 125 Stat 552. This correction was made on 9/28/2017 (see Exhibit #12).

In addition, Jeremy Stein was unable to obtain the disposition date for a (b)(3) - 112 Public Law because the store had discontinued business several years ago. Investigator (b)(6) contacted the Out of Business Record Center (OBRC) and requested from the records for The Gun Shop acquisition information for this firearm. OBRC provided documentation from the submitted records that indicated The Gun Shop received the firearm on (b)(3) - 112 Public Law 55 125 (see Exhibit #11). Jeremy Stein stated that the store uses the US Postal Service (USPS) to ship firearms to other licensees. USPS policy requires any package over 13 ounces to ship via Priority Mail. Based upon this information, the date of 11/6/2010 was used as the disposition date for the firearm. This correction was made on 9/28/2017 (see Exhibit #12).

Details of the violations (27 CFR 478.125(e) and 27 CFR 478.22) can be found in the Violations section of this report. ATF Form 5030.5, Report of Violations, Worksheet #1, Exhibits #2 through #3c, Exhibit #9 and Exhibits #11 & #12 also contain information and supporting documentation for these violations.

5 - ATF Forms 4473 – NICS & Other Dispositions

A total of (b)(3) - 112 ATF Forms 4473 were on file for the inspection period. In addition, a total of 13 forms were on file for denied transactions and transactions where a NICS check was completed but the transfer did not occur. ATF Forms 4473 are filed in chronological order. (b)(3) - 112 Public Law 55 125 Stat 55 Forms 4473 contained errors (see Exhibit #4). Violations included errors and omissions in sections A, B and D of the ATF Form 4473.

Investigator (b)(6) compared the FFL Audit Report to NICS Transaction Numbers recorded on ATF Forms 4473 (see Exhibit #5). For delayed transactions, it was noted that several ATF Forms 4473 indicated that NICS did not provide a response within 3 business days even though the audit log clearly showed a resolution to the delay. In (b)(3) - 112 instance, it appeared the firearm was transferred after receiving a denied response (see Exhibit #5). Contact with NICS liaison (b)(6) revealed that a computer system glitch had held the NTN for this FFL, resulting in the FFL not being contacted with proceed or denied information. Investigator (b)(6) queried ANR to determine if the delay/deny transaction for (b)(6), call in 5-23-2017/ denied 5-25-2017) had been referred to the field. The result stated that the information was not referred because there was insufficient evidence of a Federal prohibition based upon a previous delay/deny referral (see Exhibit #10). Because of this, Investigator (b)(6) did not refer this transaction. It should be noted that the firearm was in pawn at the business premises at the inception of the inspection (pawned 7/11/2017).

FIREARMS INSPECTION REPORT

Name: Sturon Corp
Trade Name: Stewart's Pawn Shop

UI#: 775045-2017-0109-B1B
FFL#: 4-61-111-01-7L-01048

Details of the violations (27 CFR 478.124(c)(1), 27 CFR 478.124(c)(3)(iv), 27 CFR 478.124(c)(4), 27 CFR 478.124(c)(5), 27 CFR 478.21(a)) can be found in the Violations section of this report. ATF Form 5030.5, Report of Violations, Worksheet #2 and Exhibit #4 also contain information and supporting documentation for these violations.

6 - Multiple Sales

A request for a Firearms Trace History for this licensee disclosed (b)(3) multiple sales for the inspection period (see Exhibit #6). It was determined that licensee failed to file (b)(3) multiple sale involving (b)(3) firearms. Licensee submitted the form as required (see Exhibit #8).

Details of the violation (27 CFR 478.126a) can be found in the Violations section of this report. ATF Form 5030.5, Report of Violations, Worksheet #2 and Exhibit #8 also contain information and supporting documentation for this violation.

7 - Suspicious/Prohibited Purchasers

No suspicious or prohibited purchasers were disclosed.

8 - Trace Activity

(b)(3) - 112 Public Law 55 125 traces were reported for the inspection period. At the time the inspection commenced, (b)(3) - 112 Public Law 55 125 traces indicated a successful result, and (b)(3) - 112 Public Law 55 125 trace remained (b)(3) - 112 Public Law 55 125 Stat 552. On 8/3/2017, Investigator (b)(6) overheard a conversation with Jen and another employee stating that the tracing center had contacted the business and requested a copy of the ATF Form 4473 pertaining to the traced firearm. Investigator (b)(6) witnessed Jen forwarding the requested information to the tracing center. A query of eTrace revealed the updated trace information (see Exhibit #7).

Investigator (b)(6) conducted a secondary market analysis. Approximately 50 firearms were queried through OpenFox and eTrace with no hits.

9 - NFA/Importer/Collector/Manufacturer

Licensee does not conduct NFA, manufacturing, collecting or importing operations.

10 - Referrals

No referrals generated during this inspection.

11 - Other

No other relevant information disclosed during this inspection.

12 - Closing Actions

On 4/24/2018, Investigator (b)(6) returned to the business premises to conduct a closing conference. Jeremy Stein was present.

FIREARMS INSPECTION REPORT

Name: Sturon Corp
Trade Name: Stewart's Pawn Shop

UI#: 775045-2017-0109-B1B
FFL#: 4-61-111-01-7L-01048

Investigator (b)(6) thoroughly reviewed the Report of Violations. Jeremy Stein signed the form and was provided a copy for the business' records. The Acknowledgement of Federal Firearms Regulations was also reviewed (see Exhibit #18), with particular emphasis placed on proper recordkeeping, proper preparation of the A&D Record Book, proper preparation of the ATF Form 4473 and proper filing/maintenance of ATF Forms. Jeremy Stein signed the form and was provided a copy for the business' records.

13 – Violations

1. **27 CFR 478.125(e)**

Nature of violation: Failure to properly maintain the Acquisition and Disposition Record Book

- (b)(6) instances, a firearm disposition was recorded though the firearm was in inventory.
- (b)(6) stances, a firearm disposition was not recorded.
- (b)(6) stance, the firearm serial number was not recorded.
- (b)(6) instances, the firearm serial number was incorrect.
- (b)(6) stance, the firearm caliber was incorrect.
- (b)(6) stances, the disposition date was incorrect.
- (b)(6) instances, the disposition date was not recorded.
- (b)(6) stance, the book indicated that a firearm was not transferred because it was defective, however the firearm was not located on the business premises.

Licensee Response: Licensee attributed the discrepancies to human error.

Corrective Action: Licensee has amended the A&D Record Book to reflect the correct information. In the future, licensee will ensure that entries to the A&D Record Book are accurate and timely.

Worksheets and Exhibits: Worksheet #1, Exhibits #3 through #3c, Exhibit #9, Exhibit #11 and Exhibit #12

2. **27 CFR 478.22**

Nature of violation: Failure to ensure compliance with an approved alternate method or procedure, i.e. ATF Ruling 2016-1.

Licensee Response: Jeff and Jeremy Stein both stated that the business had never been informed of the requirements for the blanket electronic recordkeeping variances approved under ATF Ruling 2016-1 (as well as prior ATF Rulings pertaining to electronic recordkeeping)

Corrective Action: Licensee has installed new software and hardware, and the electronic recordkeeping system is now in compliance with the parameters of ATF

FIREARMS INSPECTION REPORT

Name: Sturon Corp
Trade Name: Stewart's Pawn Shop

UI#: 775045-2017-0109-B1B
FFL#: 4-61-111-01-7L-01048

Ruling 2016-1. If licensee intends to maintain an electronic A&D Record Book, licensee will ensure compliance with all elements of ATF Ruling 2016-1. If licensee is unable to meet all requirements of ATF Ruling 2016-1, or any future ruling pertaining to electronic recordkeeping, licensee will discontinue use of the electronic recordkeeping system and maintain manual records.

Worksheets and Exhibits: Exhibit #2 and Exhibit #17

3. **27 CFR 478.126a**

Nature of violation: Failure to prepare and submit ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers [REDACTED] instance.

Licensee Response: Licensee attributed the discrepancy to human error.

Corrective Action: Licensee has submitted the ATF Form 3310.4. Licensee will ensure that ATF Form 3310.4 is completed and submitted by close of the business day in any case where 2 or more handguns are transferred to a non-licensee within a 5 business day period. Licensee will ensure that copy 1 is forwarded to ATF, copy 2 is forwarded to the local law enforcement agency and copy 3 is attached to the corresponding ATF Form 4473.

Worksheets and Exhibits: Worksheet #2, Exhibit #8

4. **27 CFR 478.124(c)(1)**

Nature of violation: Failure to obtain a properly completed ATF Form 4473, 2012 edition

- [REDACTED] instance, the state of birth was not recorded in item #3.
- [REDACTED] instance, a purchaser provided a "yes" answer to item #11c, which reads "Have you ever been convicted in any court of a felony or any other crime for which the judge could have imprisoned you for more than one year, even if you received a shorter sentence including probation?" The licensee proceeded with the transaction. Subsequent investigation found that the purchaser was not prohibited.
- [REDACTED] instance, the country of citizenship was not recorded in item #14.
- [REDACTED] instances, the date was incorrect in item #17.
- [REDACTED] instance, the date was not recorded in item #17.

2016 edition

- [REDACTED] instances, the date was incorrect in item #15.
- [REDACTED] instances, the date was not recorded in item #15.

Licensee Response: Licensee attributed the discrepancies to human error.

FIREARMS INSPECTION REPORT

Name: Sturon Corp
Trade Name: Stewart's Pawn Shop

UI#: 775045-2017-0109-B1B
FFL#: 4-61-111-01-7L-01048

Corrective Action: In the future, licensee will ensure that ATF Forms 4473 are accurate and complete prior to transferring the firearm.

Worksheets and Exhibits: Worksheet #2, Exhibit #4

5. **27 CFR 478.124(c)(3)(iv)**

Nature of violation: Failure to ensure proper completion of Section B, ATF Form 4473

2012 edition

- [REDACTED] instance, the NICS response was not recorded in item #21d.

2016 edition

- [REDACTED] instance, the NTN was incorrect in item #19b.
- [REDACTED] instance, the date of NICS contact was incorrect in item #19a.

Licensee Response: Licensee attributed the discrepancies to human error.

Corrective Action: In the future, licensee will ensure that ATF Forms 4473 are accurate and complete prior to transferring the firearm.

Worksheets and Exhibits: Worksheet #2, Exhibit #4

6. **27 CFR 478.124(c)(4)**

Nature of violation: Failure to properly complete Section D, ATF Form 4473

2016 edition

- [REDACTED] instance, the serial number was incorrect in item #26.
- [REDACTED] instance, the type of firearm was incorrect in item #27.

Licensee Response: Licensee attributed the discrepancies to human error.

Corrective Action: Licensee has made corrections to copies of the ATF Forms 4473 and has attached the corrected copies to the corresponding forms. In the future, licensee will ensure that ATF Forms 4473 are accurate and complete prior to transferring the firearm.

Worksheets and Exhibits: Worksheet #2, Exhibit #4

7. **27 CFR 478.124(c)(5)**

Nature of violation: Failure to properly complete Section D, ATF Form 4473

2016 edition

- [REDACTED] instances, the date of transfer was incorrect in item #37.

Licensee Response: Licensee attributed the discrepancies to human error.

FIREARMS INSPECTION REPORT

Name: Sturon Corp
Trade Name: Stewart's Pawn Shop

UI#: 775045-2017-0109-B1B
FFL#: 4-61-111-01-7L-01048

Corrective Action: In the future, licensee will ensure that ATF Forms 4473 are accurate and complete prior to transferring the firearm.

Worksheets and Exhibits: Worksheet #2, Exhibit #4

8. **27 CFR 478.21(a)**

Nature of violation: Failure to ensure ATF Form 4473 was properly completed. 2012 edition

- [REDACTED] instances, the type of firearm was incorrect in item #18.
- [REDACTED] instance, the number of firearms transferred was not recorded in item #30a.
- [REDACTED] instance, item #30b was not completed.

2016 edition

- [REDACTED] instance, the number of firearms transferred was incorrect in item #29.
- [REDACTED] instances, item #30 was not properly completed.

Licensee Response: Licensee attributed the discrepancies to human error.

Corrective action: Licensee has made corrections to copies of the ATF Forms 4473 and has attached the corrected copies to the corresponding forms. In the future, licensee will ensure that ATF Forms 4473 are accurate and complete prior to transferring the firearm.

Worksheets and exhibits: Worksheet #2, Exhibit #4

4/24/2018

x (b)(6)

Industry Operations Investigator
Signed by: ATF

FIREARMS INSPECTION REPORT

Name: Sturon Corp
Trade Name: Stewart's Pawn Shop

UI#: 775045-2017-0109-B1B
FFL#: 4-61-111-01-7L-01048

Index of Worksheets and Exhibits

Worksheets

Informational page
Worksheet 1 Inventory and A&D Review Worksheet
Worksheet 2 ATF Form 4473 Review Worksheet
Statistical page

Exhibits

Exhibit 1 Corporate information from KY SOS website
Exhibit 2 Inventory listing provided by licensee
Exhibit 3 A&D Record Book discrepancies
Exhibit 3a (b)(3) - 112 Public Law 55 125 Stat 552
Exhibit 3b Hi Point pistol – documentation from Broadway location
Exhibit 3c Copy of A&D Record Book with errors highlighted
Exhibit 4 ATF Forms 4473 with errors
Exhibit 5 NICS Audit Log
Exhibit 6 Firearm Trace History
Exhibit 7 eTrace printout – completed trace
Exhibit 8 Multiple sale not filed – eTrace printout
Exhibit 9 Documents provided by Jeremy Stein to reconcile A&D Book discrepancies
Exhibit 10 Documentation (b)(3) - 112 Public Law 55 125 Stat 552 transaction
Exhibit 11 Documentation from (b)(3) - 112 Public Law 55 125 Stat 552
Exhibit 12 A&D Record Book corrections – 9/28/2017
Exhibit 13 Letter to Jeff Stein – non-compliant electronic recordkeeping system
Exhibit 14 Email from Jeff Stein – challenges with the new recordkeeping system
Exhibit 15 Email from AS (b)(6) – discussion with Jeff Stein regarding new recordkeeping System
Exhibit 16 Email from AS (b)(6) – Jeff Stein contact regarding installation of software and data migration
Exhibit 17 New electronic recordkeeping system
Exhibit 18 Acknowledgement of Federal Firearms Regulations