

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) BKB Outdoors Inc 10Ring.com 12779 Jones Rd.; Ste. 103B Houston, TX 77070, Harris - 201	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 782075-2017-0192-B1B		
	3. PERMIT/LICENSE NUMBER 576201019D02612	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), INVESTIGATIVE ANALYST, 01/25/2017

8. PURPOSE/SPECIAL INSTRUCTIONS

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	5	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS	2	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) - Industry Operations Investigator
Submitted on: 09/28/2017

Viols WL ONLY and Recall Inspection

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
APR 2017	5.00		
MAY 2017	1.00		
JUN 2017	1.00		
JUL 2017	44.00		
AUG 2017	40.00		
SEP 2017	12.00		
ATF OFFICER'S SUBTOTAL	103.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	103.00		

13. REVIEW AND ROUTING
REVIEW COMMENTS AND RECOMMENDATION
Viols WL ONLY and Recall Inspection

<input checked="" type="checkbox"/> REVIEWED	<input checked="" type="checkbox"/> FINAL DISPOSITION
SIGNATURE AND TITLE (b)(6) - Area Supervisor	REVIEW DATE 09/29/2017

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) BKB Outdoors Inc 10Ring.com 12779 Jones Rd.; Ste. 103B Houston, TX 77070, Harris - 201	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 782075-2017-0192-B1B		
	3. PERMIT/LICENSE NUMBER 576201019D02612	4a. TARGET DATE 9/30/2017	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

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 3KB Outdoors Inc 10Ring.com	Street Address 12779 Jones Rd.; Ste. 103B	City Houston	State TX	Zip Code 77070-	County Harris - 201	Page 1 of 3 Pages
License/Permit/Registry Number (If any) 575201019D02612		Expiration Date 4/1/2019	Date(s) or Period of Inspection 07/18/2016 through 07/18/2017			

Inspection Results

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 enter into a record each receipt and every disposition of individual firearms (b)(3) 112 P instances).

Specifically, the disposition of the following firearms were not timely recorded:

(b)(3) 112 Public Law 55 125 STAT 552

Citation: 27 CFR 478.125(e)

Date Corrections to be Made: 07/28/2017

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee shall correct the record to reflect the date of acquisition and/or disposition and other required information as to whom the firearm was acquired and/or disposed. In the future, the licensee shall make entries of acquisition and disposition in the time period prescribed by law or regulation.

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 3KB Outdoors Inc 10Ring.com	Street Address 12779 Jones Rd.; Ste. 103B	City Houston	State TX	Zip Code 77070-	County Harris - 201	Page 2 of 3 Pages
License/Permit/Registry Number (If any) 575201019D02612		Expiration Date 4/1/2019	Date(s) or Period of Inspection 07/18/2016 through 07/18/2017			

Inspection Results

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

Number: 2

Nature of Violation:

Failure to obtain and/or furnish all information required in each ATF Form 4473 as indicated by the headings on the form and the instructions on or pertaining to it (b)(3) 112 Forms).

(b)(3) 112 Public Law 55 125 STAT 552 (b)(6)

Citation: 27 CFR 478.21(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

In the future, the licensee shall ensure the Transferee completes Section C as required if the transfer does not take place on the same date as the Transferee completes Section A. Also the licensee shall ensure the permit information is completed in on each ATF Form 4473, where a valid permit from the state is used as an exception to NICS.

Number: 3

Nature of Violation:

Failure to obtain a properly completed ATF Form 4473, Section A, prior to making an over-the-counter transfer of a firearm to a non-licensee, who is a resident of the State in which the licensee's premises is located (b)(3) 112 Forms).

(b)(3) 112 Public Law 55 125 STAT 552 (b)(6)

Citation: 27 CFR 478.124(c)(1)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

In the future, the licensee shall ensure the Transferee properly completes Section A of the ATF Form 4473. The licensee shall initiate practices and procedures to prevent further violations.

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 3KB Outdoors Inc 10Ring.com	Street Address 12779 Jones Rd.; Ste. 103B	City Houston	State TX	Zip Code 77070-	County Harris - 201	Page 3 of 3 Pages
License/Permit/Registry Number (If any) 575201019D02612		Expiration Date 4/1/2019	Date(s) or Period of Inspection 07/18/2016 through 07/18/2017			

Inspection Results

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

Number: 4

Nature of Violation:

Failure to prepare and submit a report of multiple sales or other disposition (ATF Form 3310.4) whenever the licensee sells or otherwise disposes of, two or more pistols, or revolvers, or any combination of pistols or revolvers totaling two or more to an unlicensed person at one time or during any five consecutive business days (ATF Form 3310.4).

(b)(3) 112 Public Law 55 125 STAT 552 (b)(6)

Citation: 27 CFR 478.126a

Date Corrections to be Made: 07/28/2017

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee shall complete an ATF Form 3310.4 for the transactions and submit them as prescribed. In the future, the licensee shall submit an ATF Form 3310.4 for each multiple sale of handguns by the close of the business day as prescribed by regulation.

Number: 5

Nature of Violation:

Failure to prepare and submit a report of multiple sales or other disposition (ATF Form 3310.12) whenever the licensee sells or otherwise disposes of, two or more certain rifles totaling two or more to an unlicensed person at one time or during any five consecutive business days (ATF Form 3310.12).

(b)(3) 112 Public Law 55 125 STAT 552 (b)(6)

Citation: 18 U.S.C. 923(g)(5)(A)

Date Corrections to be Made: 07/28/2017

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee shall complete an ATF Form 3310.12 for the transactions and submit them as prescribed. In the future, the licensee shall submit an ATF Form 3310.4 for each multiple sale of certain rifles by the close of the business day as prescribed by regulation.

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

Date 7/28/17

Signature of ATF Officer

Date 7/28/2017



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
5825 N. Sam Houston Parkway West, Suite 300
Houston, Texas 77086

www.atf.gov

September 29, 2017

782075 (b)(6)
5373

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

BKB Outdoors, Inc.
dba 10Ring.com
12779 Jones Rd.; Ste. 103B
Houston, TX 77070
ATTN: Mr. Bryan Brassell

REF: FFL # 5-76-201-01-9D-02612

Dear Mr. Brassell:

During a recent compliance inspection at your firearms business covering the period of **July 18, 2016 through July 18, 2017**, you were cited for violations of 27 Code of Federal Regulations, Part 478. A copy of the Report of Violations, Form 5030.5, issued at the time of the inspection is enclosed.

All violations were fully explained to you by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) investigator. You indicated that you understood the requirements of the firearms laws and regulations. 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 effort to reduce violent crime and protect the public. It is essential that you comply with all Federal laws and regulations that govern your firearms business. This is critical to carrying out our mission to protect the public and ensure that criminals do not gain access to firearms. 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 conditioned upon your compliance with Federal laws and regulations. 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.

BKB Outdoors, Inc.
dba 10Ring.com

FFL # 5-76-201-01-9D-02612

Should you have any questions regarding this matter, please contact myself or Investigator

(b)(6)

Sincerely yours,

(b)(6)

Area Supervisor
Houston VII Field Office

Enclosure: Report of Violations

cc: Federal Firearms Licensing Center
DIO, Houston Field Division
Houston VII Field Office

FIREARMS INSPECTION REPORT

Name: BKB Outdoors Inc.
Trade Name: 10Ring.com

UI#: 782075-2017-0192-B1B
FFL#: 5-76-201-01-9D-02612

Address: 12779 Jones Rd, Ste 103B
Houston, Texas 77070

1 - Introduction

Inspection Profile:

On 07/18/2017, Investigator (b)(6) of the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) initiated a Dealer in Firearms Southwest Border Disposition Emphasis – Recall Inspection on BKB Outdoors Inc., dba 10Ring.com. Investigator Hold met with , Mr. Bryan Allen Brassell, president and responsible person. Mr. Brassell was identified by Investigator Hold by his Texas Driver's License number, (b)(6) which expires on 09/16/2021. The inspection period covered 07/18/2016 to 07/18/2017. Advanced notification was not provided.

On 07/28/2017, Investigator (b)(6) completed the review of the inventory and review of the required records for the licensee. The review of the inventory and required records consisted of the following:

1. A review of the inventory of the licensee, to include a comparison of serial numbers to the Acquisition and Disposition (A&D) Record.
2. A review of the licensee's A&D Record.
3. A review of the ATF Forms 4473 on file by the license for the period of 07/18/2016 to 07/18/2017, to include a comparison of a random sampling of the ATF Forms 4473 reviewed to the A&D Record.
4. A review of the ATF Forms 4473, for which a Denial was provided as a NICS response, for the last five years.

Business Profile:

The licensee is located in a commercial storefront in the unincorporated of Houston, (Harris County), Texas. The licensee sells a variety of firearms, firearms accessories, and ammunition to the general public.

During the inspection period, the licensee acquired approximately (b)(4) firearms and disposed of approximately (b)(4) firearms. Sales consist of retail sales of new and used firearms to the general public. The licensee acquires new firearms from various distributors. Mr. Brassell stated he receives firearms from a variety of suppliers, such as (b)(4), and a variety of other distributors. The licensee stated he conducts firearms transfers for customers, where the customer orders or purchases a firearm from various internet vendors and then ships the firearm to him to conduct a transfer.

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The licensee does not participate in gun shows. The licensee operates a website, www.10ring.com, which directs customers to an online sales site where firearms and accessories are listed. The licensee does have an ATF Dealer of Black Powder License, (b)(7)(F), issued by ATF. There are no other businesses or ATF licenses/permits located at the premises.

BKB Outdoors Inc has an active Sales and Use Tax Permit with the Texas Comptroller of Public Accounts. The licensee is issued taxpayer number, (b)(3) - 26 USC 6103, and the location is designated as an outlet 00004. BKB Outdoors Inc also has an active Franchise Tax account (**Reference Exhibit 1**).

BKB Outdoors Inc utilizes the assumed name, "10Ring.com," for the business. The assumed name is registered with the Harris County Clerk and the Texas Secretary of State (**Reference Exhibit 2**).

The licensee has held the Type 01 Dealer of Firearms license since 03/30/2010. The license expires on 04/01/2019. The Type 01 license is utilized to carry out the transactions involving new and used Gun Control Act firearms. The licensee does not utilize off-site storage.

Ownership and Control:

BKB Outdoors Inc is a domestic for profit corporation registered with the Texas Secretary of State (**Reference Exhibit 3**). Mr. Brassell is the president of the corporation and owns (b)(4) of the shares. He stated Thomas Haisten owns the remaining stock. There are no other entities or persons with any financial or ownership interest or stake in the business. No hidden ownership is suspected.

The information in the Federal Licensing System was reviewed with Mr. Brassell. Mr. Brassell stated the information for him needed to be updated to reflect the address of (b)(6). He stated that responsible persons Edmund Paul Demery and Kimberly Lynn Spellment needed to be deactivated as the responsible personst. There were no additional corrections or changes to be made to the FLS record.

Variance:

No variances have been issued and a variance was not requested.

2 - Recommendation

Violations, Warning Letter and Recall Inspection

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Name: BKB Outdoors Inc.
Trade Name: 10Ring.com

UI#: 782075-2017-0192-B1B
FFL#: 5-76-201-01-9D-02612

3 - Inspection History

Date of Inspection: 09/29/2015
Type of Inspection: Southwest Border Compliance Inspection
UI#: 782075-2015-0280-B1B
Inspection Results: Violations, Warning Letter and Recall Inspection
Cited Violations: 27 CFR 478.21(a) – (b)(3) - 112 instances
27 CFR 478.102(a) – (b)(3) - 112 instance
27 CFR 478.124(c)(1) – (b)(3) - 112 instances
27 CFR 478.124(c)(3)(i) – (b)(3) - 112 Public instances
27 CFR 478.124(c)(3)(iv) – (b)(3) - 112 instances
27 CFR 478.124(c)(4) – (b)(3) - 112 instance
27 CFR 478.124(c)(5) – (b)(3) - 112 instances
27 CFR 478.126(a) – (b)(3) - 112 Public instances

Date of Inspection: 01/13/2014
Type of Inspection: Qualification Inspection
UI#: 782075-2014-0139-B1B
Inspection Results: Application Approved
Cited Violations: None

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

In a comparison of inventory to the Acquisition and Disposition (A&D) book conducted by Investigator (b)(6), there were 112 firearms in inventory and (b)(3) - 112 open dispositions in the A&D book, resulting in (b)(3) - 112 Public discrepancies. The review disclosed that the disposition of (b)(3) - 112 Public firearms were not properly recorded in the A&D record. This is a violation of 27 CFR 478.125(e) (**ROV, Violation #1, Worksheet 1, and Exhibit 4**)

The licensee did not file any theft/loss reports during the inspection period. The licensee did file a ATF Theft/Loss form as a result of this inspection. The licensee reported the firearms were brought in by customers to transfer to another licensee, however, the licensee information was not recorded in the disposition section of the A&D record. Mr. Brassell stated his employees attempted to contact the person who brought in each firearm to determine the licensee to whom the firearm was sent, but they were not successful in determining the information needed for five of the firearms. The A&D book is in the proper format and the entries appeared to be made in a timely fashion, other than the disposition of the seven firearms.

There were no indications of trafficking found in the A&D book or ATF Forms 4473. There were no illegal firearms or firearms with obliterated serial numbers discovered during the course of this inspection. Approximately 20 firearms were traced through the licensee's records from acquisition to disposition with no discrepancies found.

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The licensee utilizes a manual record for the A&D Record. Mr. Brassell advised employees will enter acquisitions and dispositions on the date they occur to ensure accuracy and completeness. Mr. Brassell acknowledged he does not conduct regular inventories to verify the A&D Record. Mr. Brassell was encouraged by Investigator (b)(6) conduct complete inventories on a regular basis to check the accuracy of the A&D Record.

5 - ATF Forms 4473 – NICS & Other Dispositions

Investigator (b)(6) reviewed the (b)(3)-(112) ATF Forms 4473 on file during the inspection period. The forms were filed sequentially by form number. There were 24 NICS Denials on file for the past five years. The NICS Audit Log contained a total of 101 NICS Transaction Numbers, including denials, to compare with the ATF Forms 4473 on file, and no discrepancies were found. There were no sales to law enforcement officers during the inspection period.

During a review of the ATF Forms 4473, Investigator (b)(6) found a total of four ATF 4473 forms containing errors. The forms associated with the violations are as follows:

On (b)(3)-(112) ATF Forms 4473, the licensee failed to obtain and/or furnish all information required in each ATF Form 4473 as indicated by the headings on the form and the instructions on or pertaining to it, which is a violation of 27 CFR 478.21(a) **(ROV, Violation # 2, Worksheet 2, and Exhibits 5, 6, and 7).**

On (b)(3)-(112) ATF Forms 4473, the licensee failed to obtain a properly completed ATF Form 4473, Section A, prior to making an over-the-counter transfer of a firearm to a non-licensee, who is a resident of the State in which the licensee's premises is located, which is a violation of 27 CFR 478.124(c)(1) **(ROV, Violation # 3, Worksheet 2, and Exhibits 5 and 8).**

Mr. Brassell stated the employees are supposed to review each ATF Form 4473 prior to transferring a firearm to prevent errors or violations. He also stated the employees are supposed to review the forms at the end of the day to check again for any errors or violations. He stated the ATF Forms 4473 are issued serialized numbers and are arranged sequentially.

6 - Multiple Sales

There were (b)(3)-(112) reports of multiple handgun sales or sales of certain rifles on file with ATF for the inspection period. A review of forms disclosed (b)(3)-(112) unreported transactions sales of multiple handguns for a total of (b)(3)-(112) handguns, which is a violation of 27 CFR 478.126a **(ROV, Violation #4, Worksheet 2, and Exhibits 9 and 10).**

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There was also (b)(3)-(1)(2) unreported sales of certain rifles for a total of (b)(3)-(1)(2) rifles, which is a violation of 18 USC 923(g)(5)(A) **(ROV, Violation #5, Worksheet 2, and Exhibit 11)**.

7 - Suspicious/Prohibited Purchasers

No suspicious/prohibited purchasers were identified during the inspection.

8 - Trace Activity

There were (b)(3)-(1)(2) completed firearm traces during the inspection period. There were no unresolved traces.

9 - NFA/Importer/Collector/Manufacturer

The licensee does not operate as a firearms manufacturer. The licensee does not conduct any importer activities. The licensee does not conduct any collector activities. The licensee does not operate as a Class 3 NFA dealer.

10 - Referrals

There were zero referrals made during this inspection.

11 - Other

The licensee is in possession of trigger locks, the state regulations guide and the current edition of the ATF Regulations Guide. The licensee is compliant with the Youth Handgun Safety Act (poster and notice) provisions. The license is also properly posted.

A NCIC query of the responsible persons through OpenFox disclosed no prohibiting factors. A firearms wanted/stolen query was not conducted as the firearms in inventory were new, rather than used firearms.

12 - Closing Actions

On 07/28/2017, Investigator (b)(6) held a closing conference with Mr. Brassell, responsible person and licensee, at the licensed premises. The inspection results were reviewed with Mr. Brassell. The Notice of Violations was also reviewed with Mr. Brassell and he was provided a copy of the Notice of Violations.

The ATF regulatory requirements were also discussed with Mr. Brassell. Mr. Brassell advised he understood them and signed the Acknowledgement of Federal Firearms

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Regulations (**Reference Exhibit 12**). Mr. Brassell was provided a copy of the Acknowledgement.

Mr. Brassell was also provided a copy of the Important Notice – Selling Firearms AFTER Revocation, Expiration, or Surrender of an FFL and the notice was reviewed with him. Mr. Brassell was also provided a copy of the current ATF Houston telephone list.

Mr. Brassell also requested a training session for his employees so they could have an opportunity to learn the regulations better. He stated he wanted to make sure his new employees did not repeat violations in the future.

13 - Violations

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

Nature of Violation:

Failure to enter into a record each receipt and every disposition of individual firearms (Seven instances).

Specifically, the disposition of the following firearms were not timely recorded:

	Date Acquired	Manufacturer	Model	Serial Number	Type	Caliber
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(b)(3) - 112 Public Law 55 125 Stat 552

Licensee's response:

Mr. Brassell stated the firearms in question were shipped to other dealers at the request of customers. He stated the employees at the time were recording the acquisition in the

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record but for some reason they were not recording all the disposition to the other dealers. He stated they went back and have attempted to determine the licensee to whom the firearm was disposed. He stated the current employees know to log the acquisition and disposition of each firearm. He stated they will look at other measures to help prevent this in the future.

Corrective action:

Licensee shall correct the record to reflect the date of disposition and other required information as to whom the firearm was disposed. In the future, the licensee shall make entries of acquisition and disposition in the time period prescribed by law or regulation.

Prior to the closing conference on 07/28/2017, Investigator (b)(6) observed the requested correction was made to the Acquisition and Disposition Record. Investigator (b)(6) reminded Mr. Brassell that an ATF Form 3310.11 Theft/Loss Report should be submitted for each firearm for which the disposition could not be determined. An ATF Form 3310.11 for the firearms was submitted (**Exhibit 13**).

Reference Worksheet 1 and Exhibit 4

2. **27 CFR 478.21(a)**
REPEAT OF VIOLATION CITED ON 09/29/2015.

Nature of Violation:

Failure to obtain and/or furnish all information required in each ATF Form 4473 as indicated by the headings on the form and the instructions on or pertaining to it ((b)(3) - 112 Pub Forms).

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

Mr. Brassell stated they should have caught the problems with the forms. He said he will pay closer attention to the forms.

Corrective action:

The licensee shall make a copy of the ATF Form 4473 pages containing the blank items. The licensee shall place the proper information for Items #30a, #31, and #32 on

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the respective copies. The corrected pages shall be maintained with the original ATF Forms 4473.

In the future, the licensee shall ensure all required information is completely and timely placed on the ATF Form 4473.

Prior to the closing conference on 07/28/2017, Investigator (b)(6) observed the requested corrections were made to copies of the ATF Forms 4473 and placed with the respective original ATF Form 4473. Investigator (b)(6) suggested Mr. Brassell utilize templates or checklists in the future to prevent violations in the future.

Reference Worksheet 2 and Exhibits 5, 6, and 7

3. **27 CFR 478.124(c)(1)**
REPEAT OF VIOLATION CITED ON 09/29/2015.

Nature of Violation:

Failure to obtain a properly completed ATF Form 4473, Section A, prior to making an over-the-counter transfer of a firearm to a non-licensee, who is a resident of the State in which the licensee's premises is located (b)(3) - 112 Public Forms).

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

Mr. Brassell stated it was a bad mistake made by employees not paying attention.

Corrective action:

In the future, the licensee shall ensure the Transferee properly completes Section A of the ATF Form 4473. The licensee shall initiate practices and procedures to prevent further violations.

Reference Worksheet 2 and Exhibits 6 and 8

4. **27 CFR 478.126a**

Nature of Violation:

Failure to prepare and submit a report of multiple sales or other disposition (ATF Form 3310.4) whenever the licensee sells or otherwise disposes of, two or more pistols, or

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revolvers, or any combination of pistols or revolvers totaling two or more to an unlicensed person at one time or during any five consecutive business days (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) Forms).

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

Mr. Brassell stated the employees were instructed by previous employees incorrectly and as a result the sales were not properly reported.

Corrective action:

The licensee shall complete an ATF Form 3310.4 for the transactions and submit them as prescribed. In the future, the licensee shall submit an ATF Form 3310.4 for each multiple sale of handguns by the close of the business day as prescribed by regulation.

Prior to the closing conference on 07/28/2017, Investigator (b)(6) observed the requested ATF Forms 3310.4 were completed and a copy was placed with the respective original ATF Form 4473. Investigator (b)(6) suggested Mr. Brassell ensure each employee is trained on the requirements of reporting multiple sales or other dispositions of handguns.

Reference Worksheet 2 and Exhibits 9 and 10

5. **18 USC 923(g)(5)(A)**

Nature of Violation:

Failure to prepare and submit a report of multiple sales or other disposition (ATF Form 3310.12) whenever the licensee sells or otherwise disposes of, two or more certain rifles totaling two or more to an unlicensed person at one time or during any five consecutive business days (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) Form).

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

Mr. Brassell stated the employees were instructed by previous employees incorrectly and as a result the sales were not properly reported.

Corrective action:

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Name: BKB Outdoors Inc.
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The licensee shall complete an ATF Form 3310.12 for the transactions and submit them as prescribed. In the future, the licensee shall submit an ATF Form 3310.4 for each multiple sale of certain rifles by the close of the business day as prescribed by regulation.

Prior to the closing conference on 07/28/2017, Investigator (b)(6) observed the requested ATF Form 3310.12 were completed and a copy was placed with the original ATF Form 4473. Investigator (b)(6) suggested Mr. Brassell ensure each employee is trained on the requirements of reporting multiple sales or other dispositions of certain rifles.

Reference Worksheet 2 and Exhibit 11



Industry Operations Investigator
Signed by: (b)(6)

Index of Worksheets and Exhibits

Report of Violations

Worksheet 1

Worksheet 2

Exhibit 1 – Copy of Texas Comptroller records

Exhibit 2 – Copy of Assumed Name Certificates.

Exhibit 3 – Copy of Texas Secretary of State records

Exhibit 4 – Copy of Acquisition and Disposition Record containing violations.

Exhibit 5 (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Exhibit 6

Exhibit 7

Exhibit 8

Exhibit 9

Exhibit 10

FIREARMS INSPECTION REPORT

Name: BKB Outdoors Inc.
Trade Name: 10Ring.com

UI#: 782075-2017-0192-B1B
FFL#: 5-76-201-01-9D-02612

Exhibit 11 – (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Exhibit 12 – Acknowledgement of Federal Firearms Regulations.

Exhibit 13 – Copy of ATF Form 3310.11.