

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) RDS CUSTOM GUNS & AMMUNITION LLC RDS Custom Guns & Ammunition 10383 N. U.S. Hwy 59 Nacogdoches, TX 75965, NAGODOCHES	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 781025-2017-0307-B1B		
	3. PERMIT/LICENSE NUMBER 575347010G09857	4a. TARGET DATE 9/15/2017	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

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

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
(b)(6), Area Supervisor, 08/02/2017

8. PURPOSE/SPECIAL INSTRUCTIONS
Conduct a southwest border firearms disposition emphasis inspection. Ensure the licensee meets local zoning and ATF regulations.

9. INSPECTION RESULTS		☐ CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	9	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS		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: 09/14/2017

Viols WL ONLY and Recall Inspection

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
AUG 2017	52.00		
SEP 2017	15.00		
ATF OFFICER'S SUBTOTAL	67.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
AUG 2017	19.00		
ATF OFFICER'S SUBTOTAL	19.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	86.00		

13. REVIEW AND ROUTING
REVIEW COMMENTS AND RECOMMENDATION
Viols WC with WL and Recall

☒ REVIEWED	☒ CONC	☒ FINAL DISPOSITION
SIGNATURE AND TITLE (b)(6) - Area Supervisor		REVIEW DATE 09/15/2017

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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 KAMMLER WORKS LLC	Street Address 11172 FM 1650	City GILMER	State TX	Zip Code 75645-	County UPSHUR	Page 1 of 1 Pages
License/Permit/Registry Number (If any) 575459078H07579		Expiration Date 8/1/2018	Date(s) or Period of Inspection 11/04/2016 through 11/10/2016			

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 conduct a NICS background check prior to the transfer of a firearm to a non-licensee in one instance.
- In one instance, the licensee accepted a Florida CHL in lieu of a NICS background check.
- Citation: 27 CFR 478.102(a)
- Date Corrections to be Made: (If not corrected immediately)
- Corrective Action to be Taken: The licensee was educated on the fact that only the Texas CHL/LTC can be used in lieu of a NICS background check. (If not corrected immediately)
- Number: 2
- Nature of Violation: Failure to timely or correctly report the sale of two or more pistols, or revolvers, or a combination thereof, on the same day or within five consecutive business days in one instance.
- Citation: 27 CFR 478.126a
- Date Corrections to be Made: (If not corrected immediately)
- Corrective Action to be Taken: The licensee will timely complete and submit ATF Form 3310.4 when the circumstances require it. (If not corrected immediately)
- Number: 3
- Nature of Violation: Failure to timely or correctly report the sale two or more semi-automatic rifles, larger than .22 caliber with ability to accept detachable magazines, on the same day or within five consecutive business days in one instance.
- Citation: 18 U.S.C. 922(g)(5)(A)
- Date Corrections to be Made: (If not corrected immediately)
- Corrective Action to be Taken: The licensee will timely complete and submit ATF Form 3310.12 when the circumstances require it. (If not corrected immediately)

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

Signature: (b)(6) MANAGER

Date: 11 NOV 2016

Date: 11/14/2016

FIREARMS INSPECTION REPORT

Name: RD's Custom Guns & Ammunition, LLC **UI#:** 781025-2017-0307-B1B
Trade Name: RD's Custom Guns & Ammunition **FFL#:** 5-75-347-01-7G-09857

Address: 10383 North U.S. Hwy 59
Nacogdoches, Texas 75965 Nacogdoches County

1 - Introduction

Inspection Profile:

On August 9, 2017, Investigators (b)(6) and (b)(6) initiated a compliance inspection at 10383 North U.S. Hwy 59 in Nacogdoches, Texas with Federal firearms licensee, RDS Custom Guns & Ammunition, LLC, doing business as (d.b.a) RDS Custom Guns & Ammunition, for the inspection period of August 9, 2016 through August 8, 2017. There was no advance notification given to the licensee.

Upon arriving at the business premises, Investigator (b)(6) made contact with Aaron Thomas Strong, who is identified in the Federal Licensing Center (FLS) database as a responsible person on the Federal firearms license (FFL). Investigators (b)(6) and (b)(6) presented their Federal ATF-issued credentials and informed Mr. Strong about the nature, purpose and scope of the compliance inspection. Mr. Strong (DOB: (b)(6)) identified himself with his Texas driver's license (TXDL: (b)(6)).

No other Federal, State or local agencies participated during the inspection.

Business Profile:

RDS Custom Guns & Ammunition, LLC is a domestic limited liability company. The licensee has held a FFL since June 13, 2014. The licensee conducts business from a commercial store front located in the rural city of Nacogdoches, Texas.

As a Type-01 FFL, firearms are sold/transferred to the general public, family/friends and other Federal firearms licensees. Mr. Strong stated that the licensee conducts gunsmithing for the aforementioned customers. In addition to the FFL, the licensee sales firearm accessories and ammunition. Mr. Strong stated that there are no other business activities conducted by the licensee. Investigator (b)(6) identified (b)(6) utilizing the same business premises as the licensee.

Within the previous 12 months, the licensee acquired approximately (b)(4) firearms and disposed of approximately (b)(4) firearms. Among the (b)(4) firearms acquired, there were approximately (b)(4) handguns, (b)(4) long guns, (b)(4) suppressors and (b)(4) receivers. Among the (b)(4) firearms disposed, there were approximately (b)(4) handguns, (b)(4) long guns, (b)(4) suppressors and (b)(4) receivers.

FIREARMS INSPECTION REPORT

Name: RD's Custom Guns & Ammunition, LLC **UI#:** 781025-2017-0307-B1B
Trade Name: RD's Custom Guns & Ammunition **FFL#:** 5-75-347-01-7G-09857

The licensee engages in the business of selling new and used firearms. Mr. Strong identified (b)(4) as the primary suppliers for the Federal firearms business. Mr. Strong stated that the licensee does not conduct business at gun shows but via the Internet. Mr. Strong identified www.rdscustomguns.com as the website where the licensee advertise its inventory.

Per the FLS database, the licensee does not maintain additional ATF licenses. On October 21, 2015, Industry Operations Investigator (b)(6) conducted a qualification inspection disclosing that there were no local zoning requirements that would prohibit the licensee from selling firearms from its business premises. Mr. Strong stated that he does not have any off-site storage locations.

Ownership and Control:

Investigator (b)(6) queried the Texas Secretary of State database to determine ownership; such query disclosed the following result:

On January 29, 2014, RS's Custom Guns and Ammunition, LLC filed a certificate of formation disclosing Rex D. Williams as the sole member of the limited liability company [Exhibit 1]. Mr. Strong stated that on June 16, 2017, Mr. Williams filed a certificate of amendment adding Aaron T. Strong and Alexis D. Strong as members of the company [Exhibit 2].

Investigator (b)(6) inquired if the ATF was notified of the aforementioned change with Mr. Strong; who provided a negative response. Investigator (b)(6) advised Mr. Strong in the contents of 27 CFR 478.54, regarding change of ownership, which includes notifying the ATF, in writing, within 30 days. Mr. Strong understood the compliance of the aforementioned regulation and provided documentation of such change [Exhibit 3].

Per the FLS database, Aaron Thomas Strong, Alexis Dean Strong and Rex Dewayne Williams are listed as responsible persons. Mr. Strong informed Investigator (b)(6) that the responsible person disclosed on the FLS database should be amended to exclude Rex D. Williams as a responsible person and owner of RDS Custom Guns & Ammunition, LLC [Exhibit 4].

Variance:

The licensee is not in receipt of any approved variances and the licensee's responsible persons did not request any variances during this inspection.

FIREARMS INSPECTION REPORT

Name: RD's Custom Guns & Ammunition, LLC
Trade Name: RD's Custom Guns & Ammunition

UI#: 781025-2017-0307-B1B
FFL#: 5-75-347-01-7G-09857

2 - Recommendation

Viols WL ONLY and Recall Inspection

3 - Inspection History

The Area Office file contains the following inspection history:

Date of Inspection: October 21, 2015
Type of Inspection: Compliance Inspection
UI#: 781025-2015-0095-B1B
Inspection Results: Warning Letter Issued
Cited Violations: 27 CFR 478.21(a); 27 CFR 478.124(c)(1); 27 CFR 478.124(c)(3)(i); 27 CFR 478.124(c)(3)(iv); 27 CFR 478.124(c)(5); 27 CFR 478.102(a); 27 CFR 478.102(a)(2)(ii); 27 CFR 478.125(e)

Date of Inspection: April 9, 2014
Type of Inspection: Qualification Inspection
UI#: 781025-2014-0296-B1B
Inspection Results: Application approved.
Cited Violations: No violations disclosed.

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

Investigator (b)(6) compared the physical inventory with the A&D Record which disclosed 156 firearms in the inventory and (b)(6) open entries in the A&D Record. Following the comparison of the inventory and A&D Record, the licensee was cited for the following violation:

27 CFR 478.125(e)

REFER TO Exhibit 5, SECTION 13 & WORKSHEET 1

There were no obliterated serial numbers or illegal firearms identified during the inspection. The A&D Record was in the proper format. There were no theft/loss reports submitted during the inspection period or as a result of this compliance inspection. The inspection of the licensee's A&D Record did not disclose any trafficking issues relating to the acquisition or disposition of firearms. There were (b)(3) firearm transactions traced through the licensee's required records that disclosed no prohibiting information.

Mr. Strong stated that he is the primary person who manages and maintain the inventory, ATF Forms 4473 and A&D Record. Mr. Strong stated that when he acquires a firearm, it is immediately logged into the A&D Record. Mr. Strong stated that the

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Name: RD's Custom Guns & Ammunition, LLC **UI#:** 781025-2017-0307-B1B
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manufacturer, model, serial number, caliber and type are taken from the firearm and recorded in the A&D Record. Mr. Strong stated that the firearm is logged out from the A&D Record once the sale/transfer has been completed. However, there were errors disclosed during the time of the inspection; which are noted in this report under **Section 13, Violations**. Investigator (b)(6) encouraged Mr. Strong to have an additional person review the records to eliminate discrepancies.

5 - **ATF Forms 4473 – NICS & Other Dispositions**

During the previous 12 months, there were (b)(3)-(1) ATF Forms 4473 in the licensee's records. Upon reviewing (b)(3)-(1) ATF Forms 4473, the licensee was cited for the following violations:

Violation 1 – 27 CFR 478.21(a)

Violation 2 – 27 CFR 478.124(c)(1)

Violation 3 – 27 CFR 478.124(c)(3)(i)

Violation 4 – 27 CFR 478.124(c)(3)(iv)

Violation 5 – 27 CFR 478.124(c)(4)

Violation 6 – 27 CFR 478.124(c)(5)

Violation 8 – 27 CFR 478.131(a)(2)

REFER TO Exhibit 6, SECTION 13 & WORKSHEET 2

There were no firearms transferred to law enforcement officers under the provisions of 27 CFR 478.134 during the inspection period. Mr. Strong stated that he is aware that a certified copy of the transferee's FFL is required to be obtained, prior to making the transaction to another licensee.

There were 41 NICS transaction numbers disclosed on the FFL Audit Report for the inspection period; comparison of the NTN with the ATF Forms 4473 disclosed no discrepancies. The licensee files the ATF Forms 4473 in chronological order. The denied and no transaction forms are filed separately from the proceed forms. There were three NICS denials on file during the investigation per the FFL Audit Report.

Mr. Strong stated that each form is reviewed prior to the firearm transaction. However, there were errors disclosed during the time of the inspection; which are noted in this report under **Section 13, Violations**. Mr. Strong stated that the firearm identifiers are recorded on the ATF Form 4473 prior to the firearm transfer. Once approved by NICS, the firearm is transferred to the customer and logged out of the A&D Record. Investigator (b)(6) instructed Mr. Strong to establish a double checking system to eliminate any future errors.

6 - **Multiple Sales**

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Trade Name: RD's Custom Guns & Ammunition **FFL#:** 5-75-347-01-7G-09857

The Firearm Trace History report disclosed no multiple firearm sale transactions. However, upon reviewing the licensee's records, there were (b)(3) instances which the licensee failed to prepare a multiple firearm sale transaction. The licensee was cited for the following violation:

Violation 7 – 27 CFR 478.126a
REFER TO Exhibit 6, Section 13 & Worksheet 2

7 - Suspicious/Prohibited Purchasers

Investigator (b)(6) queried the LexisNexis database on two individuals whereby the transferee failed to mark a response in Item #11b, Item #11c, Item #11d, Item #11e, Item #11f, Item #11g, Item #11h, Item #11i, Item #11j, Item #11k, Item #11l (2012 edition), Section A of the ATF Form 4473 to determine if there was a prohibited firearm transaction. Investigator (b)(6) did not disclose any prohibiting information with the aforementioned transferees in the LexisNexis database.

8 - Trace Activity

Investigator (b)(6) requested a Firearm Trace History report from the Violent Crime Analysis Branch prior to this inspection; which did not disclose any trace results. There were no traces that disclosed Completion Codes (b)(3) - 112 Public Law 60 125 Stat 529 the Firearm Trace History report. Investigator (b)(6) did not resolve any traces during the investigation. There were no traces of firearms international or to/from Mexico.

9 - NFA/Importer/Collector/Manufacturer

The licensee does not import or manufacture firearms/ammunition.

(b)(6) stated that the licensee has a Special Occupational Tax (SOT) stamp and engages in the business of selling NFA firearms. Per the NFA database, the licensee is current and active with its SOT. There were 26 NFA firearms in the physical inventory at the time of the inspection. The NFA Records Search database disclosed (b)(3) - 26 firearms registered to the licensee. Investigator (b)(6) inquired about (b)(3) - 26 USC 6103 firearm in inventory; Mr. Strong stated that the ATF Form 4 was approved and the customer has not had the opportunity to pick up the suppressor. After comparing the licensee's NFA inventory and NFA Records Search database, there were no discrepancies disclosed.

The licensee maintained transfer forms for each NFA item, which included ATF Form 4-Application for Tax Paid Transfer and Registration of a Firearm and ATF Form 3-Application Tax-exempt Transfer. The licensee does sell black powder firearms. The FLS database does not indicate that the licensee holds an ATF Type-03 Collector's license.

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10 - Referrals

No referrals were generated as a result of the inspection.

11 - Other

The licensee has secure gun storage and/or safety devices on the premises for customers to purchase. Mr. Strong confirmed that firearms sold are equipped with a child safety lock. Security features at the premises are adequate. The exterior doors are equipped with bolt locks and the business premises are equipped with a monitored security system.

LexisNexis background checks were conducted on Aaron Thomas Strong, Alexis Dean Strong and Rex Dewayne Williams disclosed no prohibiting information.

12 - Closing Actions

A closing conference was conducted on August 25, 2017 with Aaron Thomas Strong, manager. Investigator (b)(6) reviewed and discussed the Report of Violations with Mr. Strong.

Investigator (b)(6) discussed what corrective measures the licensee would establish to prevent discrepancies noted in the Report of Violations. Following the review of the Report of Violations, Mr. Strong signed and dated the document. Investigator (b)(6) provided Mr. Strong with a signed copy of the Report of Violations for the Federal firearms licensee's record.

Investigator (b)(6) reviewed and discussed the Acknowledgement of Federal Firearms Regulations with Mr. Strong. Investigator (b)(6) Mr. Strong the opportunity to ask questions.

Following the review, Mr. Strong signed and dated the Acknowledgement of Federal Firearms Regulations [Exhibit 7]. Investigator Morris provided Mr. Strong with a signed copy of the Acknowledgement of Federal Firearms Regulations for the licensee's records.

13 - Violations

1. **27 CFR 478.21(a)**
REPEAT VIOLATION CITED NOVEMBER 19, 2015.

Nature of Violation:

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Failure to furnish all information called for in each ATF Form 4473 as indicated by the headings on the ATF Form 4473 and the instructions on or pertaining to the ATF Form 4473.

On ATF Form 4473 (2012 edition), Item #10a, Item #11a, Item #18, Item #25 and Item #30a were either blank, incorrect or incomplete (b)(3)-112 FFD forms; (2016 edition), Item #16, Item #23, Item #29 and Item #33 were either blank, incorrect or incomplete (b)(3)-112 FFD forms.

Licensee's Response

Mr. Strong stated that the discrepancies occurred were a result of not double checking the forms prior to transferring the firearm. Mr. Strong stated that he will slow down the process of reviewing the form and allow another person, such as his wife, to review and check each form to eliminate any further discrepancies.

Corrective Action

The licensee will ensure that all ATF Forms 4473 are properly completed.

REFER TO Exhibit 6 & WORKSHEET 2.

2. **27 CFR 478.124(c)(1)**
REPEAT VIOLATION CITED NOVEMBER 19, 2015.

Nature of Violation:

Failure to obtain a properly completed ATF Form 4473 from a nonlicensee prior to the transfer of a firearm.

On ATF Form 4473 (2012 edition), Item #1, Item #2, Item #3, Item #11b, Item #11c, Item #11d, Item #11e, Item #11f, Item #11g, Item #11h, Item #11i, Item #11j, Item #11k, Item #11l and Item #17 were either blank, incorrect or incomplete (b)(3)-112 FFD forms; (2016 edition), Item #1, Item #2, Item #3, Item #12a, Item #12b, Item #12.d.1., Item #12.d.2., Item #14 and Item #15 were either blank, incorrect or incomplete (b)(3)-112 FFD forms.

Licensee's Response

Mr. Strong stated that the discrepancies occurred were a result of not double checking the forms prior to transferring the firearm. Mr. Strong stated that he will slow down the process of reviewing the form and allow another person, such as his wife, to review and check each form to eliminate any further discrepancies.

Corrective Action

The licensee will ensure that all ATF Forms 4473 are properly completed.

REFER TO Exhibit 6 & WORKSHEET 2.

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Trade Name: RD's Custom Guns & Ammunition **FFL#:** 5-75-347-01-7G-09857

3. **27 CFR 478.124(c)(3)(i)**
REPEAT VIOLATION CITED NOVEMBER 19, 2015.

Nature of Violation:

Failure to verify and correctly record identification document of transferee on ATF Form 4473.

On ATF Form 4473 (2012 edition), Item #20a was either blank, incorrect or incomplete on (b)(3)-112 forms; (2016 edition), Item #18a was either incorrect or incomplete on (b)(3)-11 forms.

Licensee's Response

Mr. Strong stated that the discrepancies occurred were a result of not double checking the forms prior to transferring the firearm. Mr. Strong stated that he will slow down the process of reviewing the form and allow another person, such as his wife, to review and check each form to eliminate any further discrepancies.

Corrective Action:

The licensee will always verify and correctly record all identification documents on the ATF Form 4473.

REFER TO Exhibit 6 & WORKSHEET 2.

4. **27 CFR 478.124(c)(3)(iv)**
REPEAT VIOLATION CITED NOVEMBER 19, 2015.

Nature of Violation

Failure to accurately note the response provided by the NICS system onto the ATF Form 4473.

On ATF Form 4473 (2012 edition), Item #21a, Item #21c and Item #21d were either blank, incorrect or incomplete (b)(3)-112 Form form; (2016 edition), Item #19a, Item# 19b, Item# 19c and Item# 19d was either incorrect or incomplete (b)(3)-112 Public forms.

Licensee's Response

Mr. Strong stated that the discrepancies occurred were a result of not double checking the forms prior to transferring the firearm. Mr. Strong stated that he will slow down the process of reviewing the form and allow another person, such as his wife, to review and check each form to eliminate any further discrepancies.

Corrective Action

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The licensee will always provide the NICS system contact date or the response provided by the NICS system on the ATF Form 4473.

REFER TO Exhibit 6 & WORKSHEET 2.

5 **27 CFR 478.124(c)(4)**

Nature of Violation:

Failure to completely and properly identify the firearm transferred on the ATF Form 4473.

On ATF Form 4473 (2012 edition), Item #29 and Item #30 were either blank, incorrect or incomplete (b)(3)-112 Public Law forms.

Licensee's Response

Mr. Strong stated that the discrepancies occurred were a result of not double checking the forms prior to transferring the firearm. Mr. Strong stated that he will slow down the process of reviewing the form and allow another person, such as his wife, to review and check each form to eliminate any further discrepancies.

Corrective Action:

The licensee will completely and properly identify the firearm transferred on the ATF Form 4473.

REFER TO Exhibit 6 & WORKSHEET 2.

6. **27 CFR 478.124(c)(5)** **REPEAT VIOLATION CITED NOVEMBER 19, 2015.**

Nature of Violation:

Failure to properly record the firearm transfer completion date upon transfer of a firearm to a nonlicensee on the ATF Form 4473.

On ATF Form 4473 (2012 edition), Item #36 was incomplete or incorrect (b)(3)-112 Public Law forms; (2016 edition), Item #37 was incomplete or incorrect (b)(3)-112 Public Law forms.

Licensee's Response

Mr. Strong stated that the discrepancies occurred were a result of not double checking the forms prior to transferring the firearm. Mr. Strong stated that he will slow down the process of reviewing the form and allow another person, such as his wife, to review and check each form to eliminate any further discrepancies.

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Corrective Action

The licensee will ensure that the ATF Form 4473 is signed and on the date the firearm transfer is completed is properly recorded on the ATF Form 4473.

REFER TO Exhibit 6 & WORKSHEET 2.

7. 27 CFR 478.126a

Nature of Violation:

Failure to report and or prepare a Report of Multiple Sale or Other Disposition of Pistols and Revolvers (ATF 3310.4), to report the sale or other disposition two or more pistols or revolvers or any combination thereof to a nonlicensee at one time or during any five consecutive business days.

On ATF Form 4473 (2012 & 2016 edition) pertaining to the contents disclosed in 27 CFR 478.126a, the licensee failed to report multiple sales [REDACTED] instances.

Licensee's Response

Mr. Strong stated that the discrepancies occurred because he was under the impression that the .22 caliber pistols were not required to be reported. Mr. Strong stated that he understood the conditions required to complete a Report of Multiple Sale or Other Disposition of Pistols and Revolvers (ATF 3310.4).

Corrective Action:

The licensee will prepare a Report of Multiple Sale or Other Disposition of Pistols and Revolvers (ATF 3310.4) to report the sale or other disposition two or more pistols or revolvers or any combination thereof to a nonlicensee at one time or during any five consecutive business days.

REFER TO Exhibit 3 & WORKSHEET 2

8. 27 CFR 478.131(a)(2)

Nature of Violation:

Failure to record on the firearms transaction record, Form 4473, any identifying number, the date of issuance (if provided), and the expiration date from the State permit or license.

On ATF Form 4473 (2012 edition), Item #23 was incomplete or incorrect [REDACTED] forms; (2016 edition), Item #21 was incomplete or incorrect on [REDACTED] forms.

Licensee's Response

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Mr. Strong stated that the discrepancies occurred were due to oversight. Mr. Strong stated that he will ensure that the ATF Form 4473 is completed entirely.

Corrective Action:

The licensee will always verify and correctly record the identifying number, the date of issuance, and the expiration date (if provided) of the valid State permit on the ATF Form 4473.

REFER TO Exhibit 6 & WORKSHEET 2

9. **27 CFR 478.125(e)**
REPEAT VIOLATION CITED NOVEMBER 19, 2015.

Nature of Violation:

Failure to record firearm disposition information in the Acquisition & Disposition Record.

According to the licensee's Acquisition and Disposition Record, the licensee failed to record the disposition information in two instances and failed to record the acquisition information ^{(b)(3) - 112 P.02} instances.

Licensee's Response

Mr. Strong stated that the discrepancies occurred were due to oversight and failing to log in the firearms in the A&D record. Mr. Strong stated that he will double check his records thoroughly to eliminate the discrepancy.

Corrective Action

The licensee will accurately and timely maintain the Acquisition and Disposition Record. The licensee amended the A&D record to reflect the correct information.

REFER TO Exhibit 5 & WORKSHEET 1

X

Industry Operations Investigator

Index of Worksheets and Exhibits

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Worksheets- Information Page; Worksheets 1-Inventory, A&D; Worksheet 2-4473(2012 edition); Worksheet 2-4473(2016 edition); Other Statistics

Exhibit 1 – RDS Customs Guns & Ammunition, LLC Original Certificate of Formation

Exhibit 2 – RDS Customs Guns & Ammunition, LLC Certificate of Amendments

Exhibit 3 – Notification of Change of Ownership

Exhibit 4 – Notification to remove Rex D. Williams from FFL.

Exhibit 5 – A&D Record (Discrepancies)

Exhibit 6 – ATF Form 4473 (Discrepancies)

Exhibit 7 – Acknowledgement of Federal Firearms Regulations



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

September 15, 2017

www.atf.gov

781025: (b)(6)
5000

RDS CUSTOM GUNS & AMMUNITION LLC
RDS Custom Guns & Ammunition
10383 N. U.S. Hwy 59
Nacogdoches, TX 75965-
RE: 575347010G09857

Dear Mr. Strong:

During a recent inspection at your firearms business covering the period August 9, 2016 to August 8, 2017 you were cited for violations of Title 27, Code of Federal Regulations, Part 478. A copy of the Report of Violations, ATF F 5030.5, issued at the time of the inspection is enclosed.

All violations were fully explained to you or your designated responsible person by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Industry Operations Investigator(s). You or your responsible person indicated that you understood the requirements of the firearms laws and regulations and 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 business. This is critical to carrying out our mission to protect the public and to ensure that criminals do not gain access to firearms. ATF appreciates the efforts you and other industry members make in this area. 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.

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

Sincerely yours,

(b)(6)

Group V

Enclosure

cc: Federal Firearms Licensing Center
Dallas V (IO) Field Office