

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Interstate Pawn, Inc. 2800 E Olive Rd Pensacola, FL 32514, Escambia	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 767065-2018-0191-B1B		
	3. PERMIT/LICENSE NUMBER 159033028K10266	4a. TARGET DATE 9/28/2018	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, 04/23/2018

8. PURPOSE/SPECIAL INSTRUCTIONS
DE COMPLIANCE INSPECTION – Type 02. Conduct full-scope inspection of the licensee. Determine if licensee deals at gun shows, over the Internet or in NFA weapons. Obtain GPS coordinates and emergency contact information. Query NForce for any criminal enforcement (CE) investigations involving the responsible person or FFL. Notify RAC prior to conducting inspection.

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC	10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	6	NO. OF REFERRALS		2111 - PER DIEM
NO. OF TECS CHECKS	137	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: 05/24/2018

Viols WL ONLY and Recall Inspection

12. TIME ACCOUNTING DATA	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)
MAY 2018	62.00
ATF OFFICER'S SUBTOTAL	62.00
ATF OFFICER'S SIGNATURE	
TOTAL HOURS	62.00

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION
Viols WL ONLY and Recall Inspection

<input checked="" type="checkbox"/> REVIEWED	<input checked="" type="checkbox"/> CONCUR	<input type="checkbox"/> SEE COMMENTS	<input checked="" type="checkbox"/> FINAL DISPOSITION
SIGNATURE AND TITLE (b)(6) - Area Supervisor			REVIEW DATE 06/05/2018

ROUTING SEQUENCE AND DATE

<input type="checkbox"/> 1.	_____
<input type="checkbox"/> 2.	_____
<input type="checkbox"/> 3.	_____
<input type="checkbox"/> 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 Interstate Pawn, Inc.	Street Address 2800 E Olive Rd	City Pensacola	State FL	Zip Code 32514-	County Escambia	Page 1 of 5 Pages
License/Permit/Registry Number <i>(If any)</i> 159033028K10266		Expiration Date 10/1/2018	Date(s) or Period of Inspection 05/14/2018 through 05/17/2018			

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 obtain and/or furnish all of the information required on each ATF Form 4473 as indicated by the headings and instructions on or pertaining to the form (forms):

- forms - Item 10.a blank.
- forms - Item 16 and/or Item 33 blank.
- form - Item 11.a error.
- form - Items 10.a, 33, 34 and 36 blank.
- form - Items 22, 23, 33, 34 and 36 blank.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee made corrections to sections B and D on a photocopy of each incomplete form. The licensee may attempt to contact individual transferees by phone or certified mail in order to have corrections made to sections A and C of the forms. The corrected photocopies should be initialed, dated, and attached to the original ATF Form 4473.

In the future, the licensee will ensure to obtain and furnish all of the information required on each ATF Form 4473 prior to transferring a firearm to a non-licensee. The licensee shall review each form for completeness and accuracy.

Citation: 27 CFR 478.21(a)

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 Interstate Pawn, Inc.	Street Address 2800 E Olive Rd	City Pensacola	State FL	Zip Code 32514-	County Escambia	Page 2 of 5 Pages
License/Permit/Registry Number <i>(If any)</i> 159033028K10266		Expiration Date 10/1/2018		Date(s) or Period of Inspection 05/14/2018 through 05/17/2018		

Inspection Results

An 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 a properly completed ATF Form 4473, Section A, prior to making an over-the-counter transfer of a firearm to a non-licensee (b)(3)-(b)(7)(F) forms):

(b)(3)-(b)(7)(F) forms, personal identification information (Items 1, 2 and 3) and/or certification information (Items 11.g, 11.i, 12.a - 12.d.1, 14 and 15) was incomplete or inaccurate.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee may attempt to contact customers by phone or certified mail in order to have corrections made by the transferees to the incomplete and inaccurate forms. The corrected photocopies should be initialed, dated, and attached to the original ATF Form 4473.

In the future, the licensee will ensure to obtain all the information required on each ATF Form 4473 prior to transferring a firearm to a non-licensee. The licensee shall review each form for completeness and accuracy.

Citation: 27 CFR 478.124(c)(1)

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

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 Interstate Pawn, Inc.	Street Address 2800 E Olive Rd	City Pensacola	State FL	Zip Code 32514-	County Escambia	Page 3 of 5 Pages
License/Permit/Registry Number (If any) 159033028K10266	Expiration Date 10/1/2018	Date(s) or Period of Inspection 05/14/2018 through 05/17/2018				

Inspection Results

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

Number: 3

Nature of Violation:
Failure to properly identify the transferee by obtaining supplemental documentation showing the transferee's current residence address and recording the information on the ATF Form 4473 (b)(3) forms);
(b)(3) forms - Item 18.b blank or error.

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

Date Corrections to be Made:
(If not corrected immediately)

Corrective Action to be Taken:
(If not corrected immediately)

The licensee may attempt to contact customers by phone or certified mail in order to obtain the identification information required in Section B of the ATF Form 4473. Corrections shall be made on a photocopy and attached to the original ATF Form 4473.

In the future, the licensee will ensure to obtain supplemental government-issued documentation if the identification document provided by the transferee does not show his/her current residence address.

Number: 4

Nature of Violation:
Failure to correctly identify the firearm to be transferred by listing the manufacturer and importer (if any), model, serial number and/or caliber or gauge of the firearm on the ATF Form 4473 (b)(3) forms);
(b)(3) forms - Item 27 (type) error.
(b)(3) forms - Item 26 (serial number) blank or error.

Date Corrections to be Made:
(If not corrected immediately)

Corrective Action to be Taken:
(If not corrected immediately)

The licensee recorded the correct information on a photocopy of the inaccurate forms. In the future, the licensee will ensure to correctly identify the firearm to be transferred and record the required information on the ATF Form 4473.

For Official Use Only

March 2020 Document Production

789

ATF E-Form 5030 5
Revised April 2005

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 Interstate Pawn, Inc.	Street Address 2800 E Olive Rd	City Pensacola	State FL	Zip Code 32514-	County Escambia	Page 4 of 5 Pages
License/Permit/Registry Number <i>(If any)</i> 159033028K10266		Expiration Date 10/1/2018		Date(s) or Period of Inspection 05/14/2018 through 05/17/2018		

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)(4)

Number: 5

Nature of Violation:

Failure to sign and/or date the ATF Form 4473 when the licensee does not know or have reasonable cause to believe the transferee is disqualified by law from receiving the firearm (b)(3) - (1) forms):

- (b)(3) - forms - Item 37 blank or error.
- (b)(3) - form - Items 35 and 37 blank.
- (b)(3) - form - Item 35 blank.

Citation: 27 CFR 478.124(c)(5)

Date Corrections to be Made:
(If not corrected immediately)

Corrective Action to be Taken: (If not corrected immediately)
The licensee recorded the correct information on a photocopy of the inaccurate forms. In the future, the licensee will ensure to sign and record the correct transfer date on the ATF Form 4473 when a firearm is transferred.

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

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 Interstate Pawn, Inc.	Street Address 2800 E Olive Rd	City Pensacola	State FL	Zip Code 32514-	County Escambia	Page 5 of 5 Pages
License/Permit/Registry Number (If any) 159033028K10266		Expiration Date 10/1/2018	Date(s) or Period of Inspection 05/14/2018 through 05/17/2018			

Inspection Results

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

Number: 6

Nature of Violation:

Failure to timely and/or correctly enter into a record the acquisition of individual firearms (b)(3)-(7) instances);

(b)(3)-(7) instances - The address or Federal Firearms License number of the person or licensee from whom a firearm was received was not recorded.

(b)(3)-(7) instances - The acquisition of a firearm was not recorded in the A&D record.

(b)(3)-(7) instances - Duplicate firearm entries were recorded in the A&D record.

Citation: 27 CFR 478.125(e)

Date Corrections to be Made:
(If not corrected immediately)

Corrective Action to be Taken:
(If not corrected immediately)

The licensee made the necessary corrections in the A&D record. In the future, the licensee will ensure to timely record the acquisition of firearms and enter the information prescribed by the regulation.

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

Date

Signature and Title of ATF Officer

Date

For Official Use Only

March 2020 Document Production

791

ATF E-Form 5030 5
Revised April 2005

FIREARMS INSPECTION REPORT

Name: Interstate Pawn, Inc.
Trade Name:

UI#: 767065-2018-0191-B1B
FFL#: 1-59-033-02-8K-10266

Address: 2800 E Olive Rd
Pensacola, FL 32514 – Escambia County
N 30.510352 / W 87.206236

1 - Introduction

Inspection Profile:

On May 14, 2018, Industry Operations Investigator (IOI) (b)(6) initiated a firearms compliance inspection (Pawnbroker DE) at the business premises of Interstate Pawn, Inc., a Type 02 Federal Firearms Licensee (FFL). No other federal, state, or local agencies were present during the inspection. The inspection was conducted with the assistance of company owner and president Michael Mahn, Director of Operations Renita Chancey, and General Manager Joshua Nunmaker. The representatives were interviewed and identified with their Florida driver's licenses (Michael Mahn, DL#(b)(6) (b)(6) DOB (b)(6) Renita Andrews Chancey, DL#(b)(6) (b)(6) DOB (b)(6); Joshua Paul Nunmaker, DL#(b)(6) DOB (b)(6) 4). The period of inspection was from May 1, 2017, to May 14, 2018. The on-site inspection commenced on May 14, 2018, and was completed on May 17, 2018, when the Report of Violations was reviewed with the licensee. Advance notification of the inspection was not provided to the licensee.

Business Profile:

Interstate Pawn, Inc. operates as a licensed pawnshop that provides secured cash loans and buys and sells an assortment of used consumer goods, including jewelry, electronics, musical instruments, sporting goods, tools, and firearms. The business possesses a Type 02 firearms license as a pawnbroker in firearms other than destructive devices. The license was originally issued on September 28, 2009, and is the only ATF license possessed by the company. The licensee conducts retail sales and transfers of firearms, provides cash loans for firearms brought in as collateral, and returns firearms redeemed from pawn. The business deals in both handguns and long guns, including tactical rifles and shotguns. Approximately (b)(4) of the firearms sold/transferred by the licensee are used and are acquired from the general public (non-licensees). During the period of inspection, the licensee acquired (b)(4) firearms and disposed of (b)(4) firearms. Interstate Pawn also sells firearms on Gunbroker.com on occasion. The licensee does not deal in NFA firearms, provide repair services, or conduct business at gun shows. The licensee does not utilize off-site storage of firearms.

Business is conducted from a retail store located outside the city limits of Pensacola, Florida (commercial). The property is owned by Interstate Pawn, Inc. and ownership was verified with the Escambia County Property Appraiser

FIREARMS INSPECTION REPORT

Name: Interstate Pawn, Inc.
Trade Name:

UI#: 767065-2018-0191-B1B
FFL#: 1-59-033-02-8K-10266

(Acct #022356200). The business is located in the Heavy Commercial and Light Industrial (HC/LI) District of Escambia County where the sale of firearms is permitted. Interstate Pawn shares the premises with a motorcycle sale and repair shop owned by Mr. Mahn called Redline Motorcycles. Mr. Mahn is also the owner of Interstate Auto Sales and Interstate Pawn No. 2, LLC (FFL# 1-59-09946).

Interstate Pawn, Inc. possesses an active Florida pawn license under license number PN2609, Escambia County business tax receipts for retail and pawn, and a Florida sales tax certificate with certificate number (b)(3) - 26 USC 6103

Ownership and Control:

Interstate Pawn, Inc. is registered with the Florida Secretary of State as a for-profit corporation. The entity was originally filed on October 25, 2007 (Florida Department of State, Division of Corporations registration #P07000117816). Michal Mahn is the owner, president, and only director of the corporation (b)(6) (b)(6) was a minority owner, director, and the original president but is no longer with the company. (b)(6) shall be removed as a responsible person in the Federal Licensing System (FLS). Renita Chancey serves as the director of operations and Joshua Nunmaker is the general manager of the business. Both individuals shall be added to the license as responsible persons. IOI (b)(6) provided the individuals with a responsible person questionnaire (ATF Form 7 – Part B) and FD-258 fingerprint card during the closing conference of the inspection. Mr. Mahn was advised to have the employees submit the required information as soon as possible. NCIC and N-Force queries were completed on each responsible person (3) and the results were negative. There have been no changes in ownership or control and hidden ownership is not suspected.

Variance:

The licensee does not possess any variances and none were requested during the inspection.

2 - Recommendation

Violations, WL ONLY, and Recall Inspection.

3 - Inspection History

A review of the licensee's inspection history disclosed an original qualification inspection in 2009 and no compliance inspections.

Date of Inspection: September 12, 2009

FIREARMS INSPECTION REPORT

Name: Interstate Pawn, Inc.
Trade Name:

UI#: 767065-2018-0191-B1B
FFL#: 1-59-033-02-8K-10266

Type of Inspection: Qualification New Onsite
UI#: 767050-2009-0292-B1B
Inspection Results: Application Approved
Cited Violations: None

Date of Inspection: N/A
Type of Inspection: N/A
UI#: N/A
Inspection Results: N/A
Cited Violations: N/A

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

Discrepancies were found during a review of the licensee's acquisition and disposition record (A&D) and completion of a full inventory. The licensee records the required information in handwritten bound books designed by BookFactory LLC. At the time of the inspection, there were four (4) A&D record books on file (3 open, 1 closed). The A&D record was in the proper format but the information was not recorded correctly or timely. A full review of the A&D record revealed the licensee was recording the name and driver's license number of the individuals from whom firearms were acquired rather than the name and residential address as required by the regulations. The licensee failed to record correct or complete information for (b)(3) - 112 firearm acquisitions occurring during the period of inspection. Furthermore, there were 134 firearms in inventory and (b)(3) - 112 open entries in the A&D record. The licensee failed to record the acquisition of (b)(3) - 112 Public L firearms and (b)(3) - 112 Public L firearms were entered in duplicate. The following violation was cited as a result of the discrepancies (**Worksheet 1 and Exhibit 1**):

Violation 6: 27 CFR 478.125(e) – (b)(3) - 112 Instances

A sample of 25 ATF Forms 4473 on file for the period of inspection was compared to the dispositions in the A&D record to verify that the dispositions were recorded timely and no discrepancies were found. There were no firearms with obliterated serial numbers or other illegal firearms found in the licensee's inventory. There were no thefts or losses reported by the licensee during the period of inspection or discovered during the inspection.

The licensee's procedures for recording firearm acquisitions and dispositions and maintaining inventory were reviewed during the inspection. There are currently seven employees of the business and all are authorized to conduct firearm transactions. Multiple employees record information in the A&D record and there is no review process to ensure timely and proper recording of each firearm. Mr. Mahn stated acquisitions and dispositions are generally recorded immediately and a full inventory is conducted at least once a month by Mr. Nunmaker. The licensee reports the acquisition

FIREARMS INSPECTION REPORT

Name: Interstate Pawn, Inc.
Trade Name:

UI#: 767065-2018-0191-B1B
FFL#: 1-59-033-02-8K-10266

of all used firearms to law enforcement through LeadsOnline in order to identify stolen firearms. IOI(b)(6) reminded Mr. Mahn and the other employees of the importance of properly identifying firearms and recording the required information in the A&D record timely. IOI(b)(6) recommended limiting the number of employees authorized to record information in the record in order to eliminate or reduce errors. Proper inventory procedures were also discussed with the licensee.

The licensee made the necessary corrections in the A&D record immediately. Due to the licensee recording driver's license information in the A&D record for all acquisitions from non-licensees since commencing business (2009) and there being a limited amount of space in the A&D record for corrections, IOI(b)(6) authorized the licensee to amend only the incomplete entries. The licensee was instructed to record the name and residential address or name and FFL number of the person from whom a firearm is received for all future acquisitions.

NOTE: According to Ms. Chancey, director of operations, the driver's license number of non-licensees is also recorded in the A&D record at Interstate Pawn No. 2, LLC (1-59-09946). IOI(b)(6) informed Mr. Mahn and Ms. Chancey to record the information required by the regulations (name and residential address) for all future transactions conducted at Interstate Pawn No. 2 and any discrepancies may be cited.

5 - ATF Forms 4473 – NICS & Other Dispositions

There were (b)(3)-112 ATF Forms 4473 on file for the period of inspection, including 10 denials. The licensee retains the forms in numerical order. Each form was reviewed and several forms were found to be incomplete or inaccurate. The following violations were cited (**Worksheet 2 and Exhibit 2**):

- Violation 1:** 27 CFR 478.21(a) – (b)(3)-112 Forms
- Violation 2:** 27 CFR 478.124(c)(1) – (b)(3)-112 Forms
- Violation 3:** 27 CFR 478.124(c)(3)(i) – (b)(3)-112 Forms
- Violation 4:** 27 CFR 478.124(c)(4) – (b)(3)-112 Forms
- Violation 5:** 27 CFR 478.124(c)(5) – (b)(3)-112 Forms

The licensee immediately made corrections to the information in sections B and D on a photocopy of each form and was encouraged to attempt to contact customers in order to have the information in sections A and C corrected.

The FDLE report reflected 250 background checks completed during the period of inspection. A sample of 150 control numbers were compared to the ATF Forms 4473 and no discrepancies were found. There were 10 denied transactions on the FDLE report and 10 denied forms on file. The licensee disposed of (b)(4) firearms during the period of inspection, including (b)(4) transfers to non-licensees and (b)(4) transfers to other

FIREARMS INSPECTION REPORT

Name: Interstate Pawn, Inc.
Trade Name:

UI#: 767065-2018-0191-B1B
FFL#: 1-59-033-02-8K-10266

licensed dealers. A sample of 25 disposition entries to non-licensees was selected from the A&D record to verify an ATF Form 4473 was completed for each disposition and no discrepancies were found. The dispositions to other dealers were also recorded properly in the A&D record. The licensee does not sell firearms to law enforcement and there were no police seizures during the period of inspection.

The licensee's procedures for conducting firearm transactions and completing ATF Forms 4473 were evaluated during the inspection. Transactions are completed by all employees of the business and Mr. Nunmaker is primarily responsible for training. The employee conducting a transfer is responsible for verifying the customer's identity, completing the background check, and reviewing the completed form. Completed forms are rarely reviewed by a second employee or manager. As a result of the discrepancies found during the review of the forms, IOI (b)(6) reminded Mr. Mahn and the other employees of the importance of reviewing forms for completeness and accuracy prior to completing a transfer. The representatives were also advised to familiarize themselves with the notices, instructions, and definitions on the form.

6 - Multiple Sales

An eTrace query revealed the licensee reported (b)(3) multiple handgun sales during the period of inspection. There were no unreported multiple sales discovered during the inspection.

In order to identify if a multiple sale has occurred, the seller is responsible for reviewing all the ATF Forms 4473 completed during the last week. The licensee completes the multiple sale report immediately upon the completion of the transaction.

7 - Suspicious/Prohibited Purchasers

A review of the ATF Forms 4473 on file disclosed several forms in which the transferee failed to provide a response or provided an erroneous response to a certification question (**Violation 2**). NCIC and N-Force queries were completed on (b)(3) - 112 Public Law 55 125 Stat 55 (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) and the results were negative for any prohibiting factors.

8 - Trace Activity

The licensee was associated with (b)(3) - 112 Public Law trace requests in the last 12 months. The traces were completed successfully.

NCIC and eTrace queries were completed on 132 firearms in the licensee's inventory and the results were negative for stolen or suspect guns.

FIREARMS INSPECTION REPORT

Name: Interstate Pawn, Inc.
Trade Name:

UI#: 767065-2018-0191-B1B
FFL#: 1-59-033-02-8K-10266

9 - NFA/Importer/Collector/Manufacturer

The licensee does not deal in NFA firearms and is not an importer, collector, or manufacturer of firearms.

10 - Referrals

There were no referrals generated as a result of the inspection.

11 - Other

The Federal Firearms License (FFL) issued to the licensee is kept posted on the business premises. The licensee is compliant with both the Youth Handgun Safety Act (YHSA) and the Child Safety Lock Act. A YHSA poster is displayed behind the sales counter and all customers are provided with a notice and trigger lock during the transfer of a handgun.

The property is equipped with a Panhandle Alarm security system and video surveillance. The windows and entryway are protected with roll-down storm/security shutters and there is a concrete bollard located in front of the doors. Handguns on the sales floor are displayed in locked cases and long guns are kept behind the sales counter on the wall or in a locked gun rack. The remaining firearms in inventory, including those on pawn, are kept in one of four locked gun cabinets located in a back room. Key access to the business and firearms is restricted to Mr. Mahn, Ms. Chancey, and Mr. Nunmaker.

12 - Closing Actions

On May 17, 2018, IOI (b)(6) held a closing conference with Michael Mahn, president; Renita Chancey, director of operations; and Joshua Nunmaker, general manager, in order to discuss the results of the inspection and review the Report of Violations. Corrective and preventative actions were discussed and the Report of Violations was signed by Mr. Mahn. The Acknowledgement of Federal Firearms Regulations was also reviewed and the company representatives were given the opportunity to ask questions and address any concerns. The licensee was reminded of the responsibilities of an FFL to comply with all of the laws and regulations pertaining to the commerce of firearms and conduct of business as required by the Gun Control Act (GCA). Mr. Mahn signed the Acknowledgement and was provided a copy for reference (**Exhibit 3**). IOI (b)(6) reminded the licensee the 2014 Federal Firearms Regulations Reference Guide is available on the ATF website and provided the following forms, publications, and reference materials:

➤ ATF Contact Information

FIREARMS INSPECTION REPORT

Name: Interstate Pawn, Inc.
Trade Name:

UI#: 767065-2018-0191-B1B
FFL#: 1-59-033-02-8K-10266

- ATF Form 4473, Firearms Transaction Record
- ATF P 3317.7, Disaster Preparedness for Federal Firearms Licensees
- ATF P 5380.1, Loss Prevention for Firearms Retailers
- ATF Ruling 2016-1, Requirements to Keep Firearms A&D Records Electronically
- FDLE's Firearm Dealers Manual (March 2018)
- FFL Alert Notice
- Important Notice: Selling Firearms after Revocation, Expiration, or Surrender of an FFL

13 - Violations

1. **27 CFR 478.21(a)**

Nature of Violation: Failure to obtain and/or furnish all of the information required on each ATF Form 4473 as indicated by the headings and instructions on or pertaining to the form (b)(3) forms):

- (b)(3) forms - Item 10.a blank.
- (b)(3) forms - Item 16 and/or Item 33 blank.
- (b)(3) form - Item 11.a error.
- (b)(3) form - Items 10.a, 33, 34 and 36 blank.
- (b)(3) form - Items 22, 23, 33, 34 and 36 blank.

Licensee's Response: Mr. Nunmaker and Ms. Chancey both stated the errors occurred because the forms were clearly not properly reviewed. Ms. Chancey also said the forms should be reviewed by at least two employees, but employees often become distracted or rush to complete the transfer.

Mr. Mahn assured his employees will thoroughly review each form.

Corrective Action: The licensee made corrections to sections B and D on a photocopy of each incomplete form. The licensee was advised to contact individual transferees by phone or certified mail in order to have corrections made to sections A and C of the forms. No corrections had been made by the date of the closing conference.

In the future, the licensee will ensure to obtain and furnish all of the information required on each ATF Form 4473 prior to transferring a firearm to a non-licensee. The licensee shall review each form for completeness and accuracy.

Reference Worksheet 2 and Exhibit 2

FIREARMS INSPECTION REPORT

Name: Interstate Pawn, Inc.
Trade Name:

UI#: 767065-2018-0191-B1B
FFL#: 1-59-033-02-8K-10266

2. **27 CFR 478 124(c)(1)**

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 (b)(3)-112-P330 forms):

(b)(3)-112-P330 forms, personal identification information (Items 1, 2 and 3) and/or certification information (Items 11.g, 11.i, 12.a - 12.d.1, 14 and 15) was incomplete or inaccurate.

Licensee's Response: Similar to the previous violation, the representatives stated the errors occurred because the forms were not properly reviewed. Mr. Mahn assured his employees will thoroughly review each form.

Corrective Action: The licensee was advised to contact customers by phone or certified mail in order to have corrections made by the transferees to the incomplete and inaccurate forms. No corrections had been made by the date of the closing conference.

In the future, the licensee will ensure to obtain all the information required on each ATF Form 4473 prior to transferring a firearm to a non-licensee. The licensee shall review each form for completeness and accuracy.

Reference Worksheet 2 and Exhibit 2

3. **27 CFR 478.124(c)(3)(i)**

Nature of Violation: Failure to properly identify the transferee by obtaining supplemental documentation showing the transferee's current residence address and recording the information on the ATF Form 4473 (b)(3)-112-P330 forms):

(b)(3)-112-P330 forms - Item 18.b blank or error.

Licensee's Response: Mr. Nunmaker stated all employees are aware the address provided by the transferee in item 2 of the 4473 must be verified with an identification document, but the discrepancies were not noticed because the forms were not properly reviewed. Mr. Nunmaker and Ms. Chancey both stated the forms will be reviewed more thoroughly.

Corrective Action: The licensee was advised to contact customers by phone or certified mail in order to obtain the identification information required in Section B of the ATF Form 4473. No corrections had been made by the date of the closing conference.

FIREARMS INSPECTION REPORT

Name: Interstate Pawn, Inc.
Trade Name:

UI#: 767065-2018-0191-B1B
FFL#: 1-59-033-02-8K-10266

In the future, the licensee will ensure to obtain supplemental government-issued documentation if the identification document provided by the transferee does not show his/her current residence address.

Reference Worksheet 2 and Exhibit 2

4. 27 CFR 478.124(c)(4)

Nature of Violation: Failure to correctly identify the firearm to be transferred by listing the manufacturer and importer (if any), model, serial number and/or caliber or gauge of the firearm on the ATF Form 4473 (b)(3) forms):

(b)(3) forms - Item 27 (type) error.
(b)(3) forms - Item 26 (serial number) blank or error.

Licensee's Response: Mr. Nunmaker said these discrepancies were the result of improper review of the forms and employees either becoming distracted or rushed. He stated employees need better training on how to properly complete and review a form.

Corrective Action: The licensee recorded the correct information on a photocopy of the inaccurate forms. In the future, the licensee will ensure to correctly identify the firearm to be transferred and record the required information on the ATF Form 4473.

Reference Worksheet 2 and Exhibit 2

5. 27 CFR 478.124(c)(5)

Nature of Violation: Failure to sign and/or date the ATF Form 4473 when the licensee does not know or have reasonable cause to believe the transferee is disqualified by law from receiving the firearm (b)(3) forms):

(b)(3) forms - Item 37 blank or error.
(b)(3) form - Items 35 and 37 blank.
(b)(3) form - Item 35 blank.

Licensee's Response: Mr. Nunmaker said these discrepancies were also the result of improper review of the forms and employees either becoming distracted or rushed. He also stated one of the employees responsible for several of the errors no longer works for the company.

FIREARMS INSPECTION REPORT

Name: Interstate Pawn, Inc.
Trade Name:

UI#: 767065-2018-0191-B1B
FFL#: 1-59-033-02-8K-10266

Corrective Action: The licensee recorded the correct information on a photocopy of the inaccurate forms. In the future, the licensee will ensure to sign and record the correct transfer date on the ATF Form 4473 when a firearm is transferred.

Reference Worksheet 2 and Exhibit 2

6. 27 CFR 478.125(e)

Nature of Violation: Failure to timely and/or correctly enter into a record the acquisition of individual firearms (b)(3)-(7) instances):

(b)(3)-(7) instances - The address or Federal Firearms License number of the person or licensee from whom a firearm was received was not recorded.

(b)(3)-(7) instances - The acquisition of a firearm was not recorded in the A&D record.

(b)(3)-(7) instances - Duplicate firearm entries were recorded in the A&D record.

Licensee's Response: In regards to not recording the required acquisition information, Ms. Chancey stated both stores (Interstate Pawn and Interstate Pawn No.2) record driver's license numbers in the A&D record instead of residential addresses because the regulation allows for the name and address or name and license number. She also said Interstate Pawn No. 2 had an ATF compliance inspection in 2016 and the ATF representative who conducted the inspection said the A&D record was "good." Ms. Chancey said they want to do the right thing and will record the residential address for all future acquisitions instead of the driver's license number.

Regarding the firearms in inventory not recorded in the A&D record, Mr. Mahn nor Mr. Nunmaker could explain why the firearms were not recorded timely. Mr. Nunmaker stated he completes an inventory at least once a month by recording the firearms in inventory on a sheet of paper and comparing the list to the A&D record. He said there is a possibility he overlooked three of the firearms because they were acquired from the other store (Interstate Pawn No. 2). Mr. Mahn assured firearms acquired will be recorded in the A&D record immediately upon receipt.

Regarding the duplicate entries, Mr. Nunmaker said the firearms were most likely re-entered into the record after they could not be located in the book during an inventory or transfer. Mr. Mahn said they will do a better job maintaining the A&D record and plans to limit the number of employees authorized to record information in the record.

FIREARMS INSPECTION REPORT

Name: Interstate Pawn, Inc.
Trade Name:

UI#: 767065-2018-0191-B1B
FFL#: 1-59-033-02-8K-10266

Corrective Action: The licensee made the necessary corrections in the A&D record. In the future, the licensee will ensure to timely record the acquisition of firearms and enter the information prescribed by the regulations.

Reference Worksheet 1 and Exhibit 1

5/24/2018

(b)(6)

(b)(6)

Industry Operations Investigator

Index of Worksheets and Exhibits

Worksheets:

Informational Page

Worksheet 1 – Inventory and A&D Review

Worksheet 2 – ATF Form 4473 Review

Other Statistics

Exhibit 1: A&D Record Discrepancies

Exhibit 2: ATF Form 4473 Discrepancies (Form (b)(3) - 112 Public Law 86 125 Stat)

Exhibit 3: Acknowledgement of Federal Firearms Regulations



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Tampa Field Division

Jacksonville, FL 32256

www.atf.gov

June 5, 2018

767065: (b)(6)
5373

WARNING LETTER

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Michael Mahn
Interstate Pawn Inc.
2800 East Olive Road
Pensacola, Florida 32514

RE: 1-59-033-02-8K-10266

Dear Mr. Mahn:

During a recent inspection at your firearms business covering the period May 1, 2017, to May 14, 2018 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 by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Industry Operations Investigator. You indicated that you understood the requirements of the firearms laws and regulations and that corrective action 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.

Interstate Pawn Inc.
RE: 1-59-033-02-8K-10266

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 Investigator (b)(6) (b)(6) or me at (b)(6)

Sincerely yours,

(b)(6)

(b)(6)

Area Supervisor

cc: Federal Firearms Licensing Center
Jacksonville III Area Office

Attachment