

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Schick Sales Inc All Pawn 10595 Middle Port LA White Plains,MD 20695, Charles		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 761025-2018-0081-B1B		
		3. PERMIT/LICENSE NUMBER 852017029E02055	4a. TARGET DATE 3/30/2018	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, 10/01/2017				
8. PURPOSE/SPECIAL INSTRUCTIONS				
Conduct a full scope firearms compliance inspection for this pawnshop.				
9. INSPECTION RESULTS <input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC				
NO. OF VIOLATIONS		7	NO. OF REFERRALS	1
NO. OF TECS CHECKS		90	NO. OF TECS HITS	1
NO. OF TAX ADJUSTMENTS		\$ VALUE OF TAX INCREASES		2111 - PER DIEM
		\$ VALUE OF TAX DECREASES		2112 - P.O.A.
NO. OF ASSESSMENTS		\$ VALUE OF ASSESSMENTS		2113 - COMM. AIR
NO. OF CLAIMS		\$ VALUE OF CLAIMS		2114 - RENTAL CAR
NO. OF TAX PERIODS		\$ VALUE OF TAXES VERIFIED		2115 - GPV EXPENSES
				2116 - MISC.
				TOTAL \$ FOR INSP.
11. ATF OFFICER'S RECOMMENDATION				
Submitted by (b)(6) - Industry Operations Investigator				
Submitted on: 03/29/2018				
Violts WL ONLY and Recall Inspection				
12. TIME ACCOUNTING DATA				
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)				
FEB 2018		75.00		
MAR 2018		21.00		
ATF OFFICER'S SUBTOTAL		96.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)				
FEB 2018		34.00		
ATF OFFICER'S SUBTOTAL		34.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS		130.00		
13. REVIEW AND ROUTING				
REVIEW COMMENTS AND RECOMMENDATION				
Violations disclosed resulted in a Warning Letter and merit a Recall Inspection be conducted to ensure the licensee has come into and remained in compliance with the regulations				
Violts WL ONLY and Recall Inspection				
<input checked="" type="checkbox"/> REVIEWED <input checked="" type="checkbox"/> CONCUR <input checked="" type="checkbox"/> SEE COMMENTS <input checked="" type="checkbox"/> FINAL DISPOSITION				
SIGNATURE AND TITLE		(b)(6) - Investigator Acting Area Supervisor		REVIEW DATE
				04/02/2018

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	3. PERMIT/LICENSE NUMBER 852017029E02055	4a. TARGET DATE 3/30/2018	4b. TARGET HOURS
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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 Schick Sales Inc	Street Address 10595 Middle Port LA	City White Plains	State MD	Zip Code 20695-	County Charles	Page 1 of 5 Pages
License/Permit/Registry Number <i>(If any)</i> 852017029E02055		Expiration Date 5/1/2019		Date(s) or Period of Inspection 02/05/2018 through 02/28/2018		

Inspection Results

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

- Number:** 1
- Nature of Violation:**
Failure to ensure proper completion of forms as prescribed by the headings on the ATF F 4473 and the instructions on or pertaining to the form. This occurred in (b)(3) instances. Refer to the ROV attachment for Violation 1.
- Citation:** 27 CFR 478.21(a)
- Date Corrections to be Made:**
(If not corrected immediately)
- Corrective Action to be Taken:** Ensure proper completion of forms as prescribed, specifically the ATF Forms 4473 for all future transactions.
(If not corrected immediately)
- Number:** 2
- Nature of Violation:**
Failure to ensure proper completion of ATF Forms 4473 prior to making an over-the-counter transfer of a firearm to a nonlicensee. This occurred in (b)(3) instances. Refer to the ROV attachment for Violation 2.
- Citation:** 27 CFR 478.124(c)(1)
- Date Corrections to be Made:**
(If not corrected immediately)
- Corrective Action to be Taken:** Ensure proper completion of the forms as prescribed by Subpart H - Records, and instructions on the ATF Form 4473 for all future transactions.
(If not corrected immediately)
- Number:** 3
- Nature of Violation:**
Failure to verify identity of the transferee by examining a valid identification document presented, and noting on the Form 4473 the type of identification used, including a valid expiration date. This occurred in (b)(3) instances. Refer to the ROV attachment for Violation 3.
- Date Corrections to be Made:**
(If not corrected immediately)
- Corrective Action to be Taken:** Verify the identity of the transferee by examining a valid identification document or combination of valid identification documents presented, then accurately note on the Form 4473 the type of identification used, including a valid expiration date for all future transactions.
(If not corrected immediately)

Report of Violations

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License/Permit/Registry Number <i>(If any)</i> 852017029E02055		Expiration Date 5/1/2019		Date(s) or Period of Inspection 02/05/2018 through 02/28/2018		

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)(3)(i)

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 Schick Sales Inc	Street Address 10595 Middle Port LA	City White Plains	State MD	Zip Code 20695-	County Charles	Page 3 of 5 Pages
License/Permit/Registry Number <i>(If any)</i> 852017029E02055		Expiration Date 5/1/2019	Date(s) or Period of Inspection 02/05/2018 through 02/28/2018			

Inspection Results

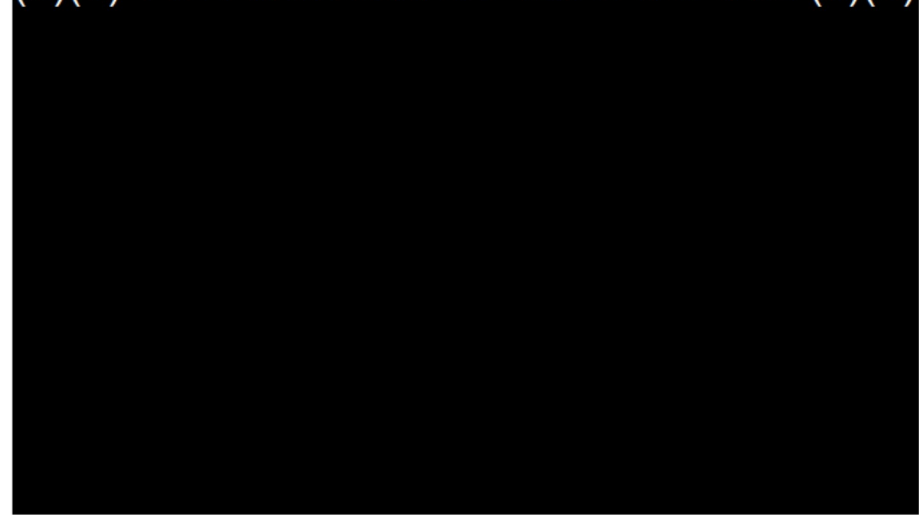
An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

Number: 4

Nature of Violation:

Failure to record on the ATF Form 4473 initial responses provided by the NICS system (or appropriate State agency), or responses after delayed response was initially provided. This occurred in [REDACTED] instances. Refer to the following transactions:

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



Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Ensure that a NICS check is requested and that the date on which NICS was contacted is recorded, as well as any response provided or if no resolution was provided within three business days.

Report of Violations

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License/Permit/Registry Number <i>(If any)</i> 852017029E02055		Expiration Date 5/1/2019	Date(s) or Period of Inspection 02/05/2018 through 02/28/2018			

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)(3)(iv)

Number: 5

Nature of Violation:

Failure to sign and/or date the Form 4473 in boxes #35 and/or #37 at the time a firearm is sold or otherwise disposed of. This occurred in (b)(3) 112 instances. Refer to the following transactions:

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

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 stated that he will make sure that the form are reviewed a second time before filing so that they can capture such errors and omissions.

Report of Violations

Instructions

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License/Permit/Registry Number (If any) 852017029E02055		Expiration Date 5/1/2019	Date(s) or Period of Inspection 02/05/2018 through 02/28/2018			

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 record the disposition of a firearm in the Acquisition & Disposition (A&D) Record Book not later than the seventh day following the date of the transaction. This occurred in (b)(6) instances. Refer to the ROV attachment for Violation 6.

Citation: 27 CFR 478.125(c)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee search through all of this records and was able to locate paperwork as verification that a transaction occurred, then recorded the disposition of all (b)(6) A&D book entries referenced in the violation.

Number: 7

Nature of Violation:

Failure to report multiple sales or other dispositions of pistols and revolvers on ATF Form 3310.4 as prescribed. This occurred in (b)(6) instances, involving (b)(6) handguns. Refer to the ROV attachment for Violation 7.

Citation: 27 CFR 478.126a

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee completed and submitted ATF Form 3310.4 to report the multiple sales for each of the (b)(6) multiple sales during the course of the inspection, from February 5, 2018 through February 28, 2018.

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

Date

3/29/2018

Signature and Title of ATF Officer

(b)(6)

IOI

Date

3/29/2018

For Official Use Only

ATF E-Form 5030.5
Revised April 2005

FIREARMS INSPECTION REPORT

Name: Schick Sales Inc.
Trade Name: All Pawn

UI#: 761025-2018-0081-B1B
FFL#: 8-52-017-02-9E-02055

Address: 10595 Middle Port La., White Plains, MD 20695 (Charles County)

1 - Introduction

Inspection Profile:

On February 5, 2018, Industry Operations Investigators (IOIs) (b)(6) and (b)(6) initiated an unannounced firearms compliance inspection at the licensed premises of Schick Sales Inc., t/a All Pawn. The licensee holds a Type 02 – Pawnbroker in Firearms Other Than Destructive Devices Federal Firearm License (FFL). During the inspection, the IOI (b)(6) interviewed Mr. Dennis K. Cohen, Secretary and responsible person (RP) on the license. Mr. Cohen presented his Maryland Driver's Licenses for identification. The inspection period was February 5, 2017 to February 5, 2018. On February 28, 2018, IOI (b)(6) held a closing conference with Mr. Cohen. Also present during the inspection was (b)(6), ATF Public Affairs Specialist, who requested to attend a firearms compliance inspection to experience how the process works. The licensee assigned his two managers (b)(6), store manager and (b)(6), assistant manager, to assist during the inventory portion of the inspection.

Business Profile:

Schick Sales Inc., doing business as All Pawn owns and operates a storefront pawnshop, offering loans for pawned items such as tools, electronics, jewelry, lawn equipment, firearms and other items of value. Items lost in pawn are offered for sale in the shop. In addition, the licensee offers new and used pistols, revolvers, rifles, shotguns, suppressors, short barreled rifles (sbr's), short barreled shotguns (sbs's), ammunition and firearms accessories. The licensee also conducts occasional gunsmithing on-site.

The premises is a commercially zoned storefront in a small strip shopping center in a urban part of Charles County.

In the last 12 months, the licensee acquired (b)(4) firearms, and disposed of (b)(4) during the same period. A breakdown of handguns verses long guns is as follows:

- Handguns: approximately (b)(4) acquired and (b)(4) disposed.
- Long guns: approximately (b)(4) acquired and (b)(4) disposed.

Approximately (b)(4) of the firearms transferred by the licensee were new and approximately (b)(4) were used. (b)(4) of the licensee's sales activity is retail

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Trade Name: All Pawn

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sales. The licensee's primary suppliers are (b) (4) and private individuals.

Schick Sales Inc. has been an industry member under the current license since April 5, 2007. The licensee did not conduct business at guns shows during the inspection period, and does not intend to do so in the future. Schick Sales Inc. advertises the business through the company website at www.allpawnandguns.com; however, does not offer firearms for sale on-line. No unrelated business is conducted by the licensee or at the licensed premises. The business is in compliance with state and local law, including zoning.

Schick Sales Inc. does not hold any other ATF licenses or permits. The company holds the following State and local licenses:

- Maryland Regulated Dealer's License
- Maryland Sales & Use Certificate
- Maryland State Trader's License
- Secondhand Precious Metals Objects Dealers License
- Pawnbrokers License

The licensee occasionally utilizes (b)(6) for offsite storage of firearms.

Ownership and Control:

Schick Sales Inc. is a Maryland based corporation formed on August 8, 2003 and is currently active and in good standing in the state of Maryland according to the Maryland Department of Assessments and Taxation (SDAT), which references the company's status under Dept. ID: (b)(3) - 26 USC 6103. The company is listed as an "Ordinary Business – Stock". There have been no changes to the business structure or ownership. Hidden ownership was not detected. The RPs are correctly shown in FLS.

Variance:

No variances are on file and none have been requested.

2 - Recommendation

Viols WL ONLY and Recall Inspection

3 - Inspection History

Date of Inspection: February 4, 2009
Type of Inspection: Firearms Compliance Inspection

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Name: Schick Sales Inc.
Trade Name: All Pawn

UI#: 761025-2018-0081-B1B
FFL#: 8-52-017-02-9E-02055

UI#: 761025-2009-0100 B1B
Inspection Results: No Violations. No further action. No referrals.
Cited Violations: No violations

Date of Inspection: January 3, 2008
Type of Inspection: Firearms Compliance Inspection
UI#: 761025-2008-0011 B1B
Inspection Results: No violations. No further action. Referrals made.
Cited Violations: No violations

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

At the time of inspection, the licensee's physical inventory consisted of 614 firearms, and the number of open dispositions in the acquisition and disposition (A&D) records was (b)(3) - 11. There was a difference of (b)(3) firearms. A full inventory was conducted by IOIs (b)(6). (b)(6), ATF Public Affairs Specialist assisted IOIs in the effort. As a result of the full inventory audit, the following discrepancies were disclosed.

The licensee failed to record the disposition of a firearm in the Acquisition & Disposition (A&D) Record Book not later than the seventh day following the date of the transaction in (b)(3) instances. Reference Violation 6 and Worksheet 1.

The licensee recorded the disposition of the each of the (b)(3) firearms that had been previously sold or otherwise transferred during the inspection, and referenced available records, i.e. ATF Forms 4473 in this effort. No thefts or losses occurred during the inspection period. The licensee maintains bound paper records as its official record. The company also enters all of its store items, including firearms into its PawnMaster database and considers the electronic records as backup to the bound paper records. The A&D records were in the proper format. The entries were found to be accurate; however, not timely made as referenced in above violation. IOIs did not trace any firearms through the required records. No firearms with obliterated serial numbers and no illegal firearms were discovered. No indication of trafficking was found.

IOI (b)(6) reviewed the licensee's standard operating procedures relevant to A&D records and inventory with Mr. Cohen and his managers. According to Mr. Cohen, firearms generally entered into the A & D Records on the date received, not later than the next morning by one of his managers (b)(6). Firearms are tagged with an internal number assigned by the stores Master Pawn system, which is how all items in the store are tagged. Each tag has firearms identifying information; however, tags do not generally reference a book, page and line number. Because of that, employees generally have to enter the information into the computer to identify the date a particular firearm was received in order to find it in the A&D records. IOI (b)(6)

FIREARMS INSPECTION REPORT

Name: Schick Sales Inc.
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UI#: 761025-2018-0081-B1B
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suggested that the licensee hand write the book, page and line number on each tag attached to the firearm for ease of locating it quickly, which would also eliminate the need to use the computer to locate a firearm in the A&D record. Because of the current system, the inventory verification took twice as long as expected. Mr. Cohen indicated that he will ensure that the staff begins handwriting the book, page and line number on each tag moving forward. IOI (b)(6) witnessed that the new step was added to all the firearms in inventory immediately after the suggestion was made. The licensee had not been conducting full inventories periodically, so IOI (b)(6) suggested that the licensee begin conducting full inventories at least once a year to minimize discrepancies and reconcile them immediately. Mr. Cohen indicated that after going through the compliance inspection, he realizes that periodic inventories will be necessary and he will implement an annual inventory moving forward. The licensed premises is equipped with an alarm system with motion sensors, locked cages and gun safes to secure firearms.

5 - ATF Forms 4473 – NICS & Other Dispositions

The licensee maintains the ATF Forms 4473 in chronological order by disposition date. A separate file is maintained for denials. The licensee had approximately (b)(6) ATF Forms 4473 on file for the inspection period. IOIs (b)(6) examined 100% of the forms. During the review of the forms, the following was discovered:

- The licensee failed to ensure proper completion of forms as prescribed by the headings on the ATF F 4473 and the instructions on or pertaining to the form. This occurred in (b)(6) instances. **Reference Violation 1, Attachment 1 and Worksheet 2.**
- The licensee failed to ensure proper completion of ATF Forms 4473 prior to making an over-the-counter transfer of a firearm to a nonlicensee. This occurred in (b)(6) instances. **Reference Violation 2, Attachment 2 and Worksheet 2.**
- The licensee failed to verify identity of the transferee by examining a valid identification document presented, and noting on the Form 4473 the type of identification used. This occurred in (b)(6) instances. **Reference Violation 3, Attachment 3 and Worksheet 2.**
- The licensee failed to record on the ATF Form 4473 initial responses provided by the NICS system (or appropriate State agency), or responses after delayed response was initially provided. This occurred in (b)(6) instances. **Reference Violation 4 and Worksheet 2.**

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Name: Schick Sales Inc.
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FFL#: 8-52-017-02-9E-02055

- The licensee failed to sign and/or date the Form 4473 in box #35 and/or #37 at the time a firearm is sold or otherwise disposed of. This occurred in (b)(3) 112 P. instances. **Reference Violation 5 and Worksheet 2.**

Forms indicating denials were reviewed by IOIs and found to be filed properly. The licensee frequently transfers firearms to other licensees and IOIs determined that such transfers were conducted properly. The licensee sold a small number of firearms to police officers for official use during the inspection period and such transfers were determined to be properly executed.

An FFL Audit Log Report for transactions involving (Maryland) non-regulated firearms and regulated firearms was requested for a 60-day time period. A total of 227 responses were provided. Of the 227 responses, 208 were proceed/not-disapproved and the remaining 19 were denied/disapproved responses. IOI (b)(6) compared the NICS Transaction Numbers (NTNs) on the audit log to the NTN recorded on the corresponding ATF Forms 4473 and no discrepancies found.

IOIs reviewed the standard operating procedures relative to ATF Form 4473 completion and other dispositions with the licensee. Mr. Cohen indicated that his staff is trained to be able to execute the ATF Form 4473, including the background check with customers to complete over-the-counter transfers of firearms. The licensee indicated that staff members will review the completed form with customers during a transaction to ensure proper completion, then once again before filing the forms. IOIs reminded the licensee to pay closer attention to the forms to ensure errors found during the inspection are not repeated. IOI (b)(6) suggested that the licensee or one of his managers conduct a second review of the forms they are files. After seeing the number of mistakes identified during the inspection, Mr. Cohen made changes to procedures, such as indicated that he generally conducts a second review of the completed forms before he files them away.

6 - **Multiple Sales**

During the inspection period, IOIs (b)(6) discovered that the licensee conducted (b)(3) 112 multiple handgun sales involving (b)(3) 112 handguns; however, according to ATF Violent Crime Analysis Branch (VCAB), no multiple sales were reported by the licensee. Upon discovery, IOIs asked the licensee why no multiple sales were reported as required and both managers (b)(6) indicated that they were not aware of the requirement. Mr. Cohen stated that he was aware of the requirement and was very surprised and disappointed that his staff was not reporting multiple handgun sales. As a result of these finding, IOIs determined that the licensee failed to report the multiple sale of a handgun in (b)(3) 112 instances, involving (b)(3) 112 handguns. **Reference Violation 7 and Worksheet 2**

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Name: Schick Sales Inc.
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UI#: 761025-2018-0081-B1B
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7 - Suspicious/Prohibited Purchasers

During the ATF Form 4473 examination, IOIs selected 40 individuals based on possible traffickers, straw purchasers and other suspicious purchasers such as repeat purchasers and forms showing background checks indicating no resolution during the inspection period. The individuals were queried through various databases including OpenFox, Accurant and Electronic Tracing System (eTrace) database and [REDACTED] CCH hit resulted in these efforts. [REDACTED] referral was generated after determining that a purchaser was convicted of a felony shortly after the firearm transaction occurred. See Section 10-Referrals below.

A review of the licensee's 19 denied/disapproved ATF Form 4473 during the review period was conducted. Firearms from denied forms were checked against forms indicating subject firearms were sold or otherwise transferred and no individuals were found to be suspected of a straw purchase.

8 - Trace Activity

In the last 12 months, the licensee was associated with [REDACTED] traces of firearms. In each instance the firearm was successfully traced through the licensee's records. The licensee acquired and sold approximately (b)(4) used firearms in the last 12 months. IOIs (b)(6) [REDACTED] chose 50 used firearms in the NCIC database through Open Fox, yielding negative results.

9 - NFA/Importer/Collector/Manufacturer

The licensee is not an importer, a collector or manufacturer. The licensee holds a current Special Occupational Tax stamp to deal in NFA firearms. The records contain all of the required information, are accurate and appear to be timely recorded. There was no evidence of acquisitions and transfers being unlawful. NFA forms were filed properly as required.

The inventory was reconciled against the National Firearms Registration and Transfer Record (NFRTR). The NFRTR revealed 11 NFA firearms, including nine silencers and two short barreled rifles (sbrs); however, the physical inventory disclosed [REDACTED] NFA firearms on-site. IOI (b)(6) compared 100% of the NFA firearms in physical inventory against the NFRTR and A&D Record, and the following discrepancy was disclosed:

(b)(3) - 26 USC 6103, (b)(6)

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(b)(3) - 26 USC 6103, (b)(6)

The manager of (b)(4) (b)(6) provided IOI (b)(6) with proof that the matter is currently being resolved and stated that the NFA Branch is in the process of voiding the approved form 5, dated November 11, 2017 for the transfer of said silencer.

Reference Exhibit 1.

To follow-up with resolving the matter IOI (b)(6) contacted the NFA Branch via email to inform them that he discovered the discrepancy during a firearms compliance inspection for Schick Sales Inc., and requested an update with regards to voiding the registration and transfer of the item in question, then offered any assistance if needed.

Reference Exhibit 2.

10 – Referrals

(b)(3) 112 referral was generated as a result of this inspection. The referral was generated after a prohibited person was determined to be in possession of a firearm. Reference Referral Number 2018-0022. The referral was submitted to Baltimore Group IV, Intelligence Group for their consideration of appropriate action. A brief summary is as follows:

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6), (b)(7)(C)

11 - Other

After the assignment was originally submitted, Area Supervisor (b)(6) discovered an error in the original Report of Violations (ROV), so on March 29, 2018 an amended ROV was emailed to Mr. Cohen, who then signed and returned it to IOI (b)(6). IOI (b)(6) assisted the licensee with signing up for Industry Updates via atf.gov.

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12 - Closing Actions

On February 28, 2018, IOI (b)(6) conducted a closing conference with Mr. Cohen, Secretary. At that time, a regulatory review was conducted, which included a review the Acknowledgement of the Federal Firearms Regulations form that was signed by IOI (b)(6) and Mr. Cohen. **Reference Exhibit 3.** On that date, IOI (b)(6) issued a Report of Violations, which was also signed by IOI (b)(6) and Mr. Cohen. Also present during the closing conference was store manager, (b)(6) and assistant manager, (b)(6).

All materials referenced during the review were provided to the licensee, along with a list of ATF phone numbers and instructions on how to access the 2014 Federal Firearms Regulations Reference Guide electronically. In addition, IOI (b)(6) provided the licensee a thumb drive with additional pertinent materials for industry members. The licensee has not yet attended an ATF held seminar in the past year; however, intends to attend the next seminar sometime in 2018. .

13 – Violations

1. 27 CFR 478.21(a)

Nature of Violation:

Failure to ensure proper completion of forms as prescribed by the headings on the ATF F 4473 and the instructions on or pertaining to the form. This occurred in (b)(3) instances. Refer to the ROV attachment.

Licensee's Response:

The licensee stated that he intends to have a meeting to go over all the violations so that the shop can improve on these errors.

Corrective Action:

Ensure proper completion of forms as prescribed, specifically the ATF Forms 4473 for all future transactions.

Reference Worksheet 2 and Attachment 1.

2. 27 CFR 478.124(c)(1)

Nature of Violation:

Failure to ensure proper completion of ATF Forms 4473 prior to making an over-the-counter transfer of a firearm to a nonlicensee. This occurred in (b)(3) instances. Refer to the ROV attachment.

Licensee's Response:

FIREARMS INSPECTION REPORT

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The licensee stated that he was disappointed in the oversights discovered during the inspection. He also stated that he intends to have a meeting to go over all the violations so that the shop can improve on these errors.

Corrective Action:

Ensure proper completion of the forms as prescribed by Subpart H - Records, and instructions on the ATF Form 4473 for all future transactions.

Reference Worksheet 2 and Attachment 2.

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

Nature of Violation:

Failure to verify identity of the transferee by examining a valid identification document presented, and noting on the Form 4473 the type of identification used, including a valid expiration date. This occurred in (b)(3) instances. Refer to the ROV attachment.

Licensee's Response:

The licensee stated that he will make sure his staff captures the proper documentation on the forms moving forward and will go over this topic in their staff meeting scheduled immediately after the closing conference.

Corrective Action:

Verify the identity of the transferee by examining a valid identification document or combination of valid identification documents presented, then accurately note on the Form 4473 the type of identification used, including a valid expiration date for all future transactions.

Reference Worksheet 2 and Attachment 3.

4. 27 CFR 478.124(c)(3)(iv)

Nature of Violation:

Failure to record on the ATF Form 4473 initial responses provided by the NICS system (or appropriate State agency), or responses after delayed response was initially provided. This occurred in (b)(3) instances. Refer to the following transactions:

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



FIREARMS INSPECTION REPORT

Name: Schick Sales Inc.
Trade Name: All Pawn

UI#: 761025-2018-0081-B1B
FFL#: 8-52-017-02-9E-02055

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



Licensee's Response:

The licensee stated that his staff will improve on checking the NICS response boxes and this will be discussed in the next staff meeting scheduled immediately after the closing conference.


Corrective Action:

Ensure that a NICS check is requested and that the date on which NICS was contacted is recorded, as well as any response provided or if no resolution was provided within three business days.

Reference Worksheet 2.

5. 27 CFR 478.124(c)(5)

Nature of Violation:

Failure to sign and/or date the Form 4473 in boxes #35 and/or #37 at the time a firearm is sold or otherwise disposed of. This occurred in  instances. Refer to the following transactions:

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



Licensee's Response:

The licensee stated that he will make sure that the form are reviewed a second time before filing so that they can capture such errors and omissions.

Corrective Action:

FIREARMS INSPECTION REPORT

Name: Schick Sales Inc.
Trade Name: All Pawn

UI#: 761025-2018-0081-B1B
FFL#: 8-52-017-02-9E-02055

The licensee stated that he will make sure that the form are reviewed a second time before filing so that they can capture such errors and omissions.

Reference Worksheet 2.

6.

27 CFR 478.125(e)

Nature of Violation:

Failure to record the disposition of a firearm in the Acquisition & Disposition (A&D) Record Book not later than the seventh day following the date of the transaction. This occurred in [REDACTED] instances. Refer to the ROV attachment.

Licensee's Response:

The licensee stated that he was disappointed in the results of the inventory verification and stated that he intends to have a meeting to go over all the violations so that the shop can improve on these errors. The licensee intends to conduct full inventories annually moving forward.

Corrective Action:

The licensee search through all of this records and was able to locate paperwork as verification that a transaction occurred, then recorded the disposition of all [REDACTED] A&D book entries referenced in the violation.

Reference Worksheet 1 and Exhibit 4.

7.

27 CFR 478.126a

Nature of Violation:

Failure to report multiple sales or other dispositions of pistols and revolvers on ATF Form 3310.4 as prescribed. This occurred in [REDACTED] instances, involving [REDACTED] handguns. Refer to the ROV attachment.

Licensee's Response:

The licensee expressed great disappointment in failing to report multiple sales. He indicated that his previous manager was on top of this, and he failed to train the current staff on the requirement and took full responsibility on this issue.

Corrective Action:

Licensee completed and submitted ATF Form 3310.4 to report the multiple sales for each of the [REDACTED] multiple sales during the course of the inspection, from February 5, 2018 through February 28, 2018.

Reference Worksheet 2 and Exhibit 5.

FIREARMS INSPECTION REPORT

Name: Schick Sales Inc.
Trade Name: All Pawn

UI#: 761025-2018-0081-B1B
FFL#: 8-52-017-02-9E-02055

X

Industry Operations Investigator

Index of Worksheets and Exhibits

Worksheet 1 – Firearms Inventory Worksheet

Worksheet 2 - ATF Form 4473 (2012 and 2016 Editions) Review Worksheet

Worknote - NFA Inventory Discrepancies

Exhibit 1 – Email from (b) (4) with void request letter to NFA Branch with forms

Exhibit 2 – Follow-up email to NFA Branch from IOI (b)(6) for NFA void

Exhibit 3 – Acknowledgement of the Federal Firearms Regulations

Attachment 1 – Attachment for Violations 1

Attachment 2 – Attachment for Violations 2

Attachment 3 – Attachment for Violation 3

Attachment 4 – Attachment for Violation 6

Attachment 5 – Attachment for Violation 7



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
31 Hopkins Plaza, 5th Floor
Baltimore, Maryland 21201

www.atf.gov

761025: (b)(6)
5370

April 2, 2018

WARNING LETTER

Mr. Dennis K. Cohen
Schick Sales, Inc., DBA All Pawn
10595 Middle Port LA
White Plains, Maryland 20695

Re: Federal Firearms License Number: 8-52-017-02-9E-02055

Dear Mr. Cohen:

As a result of a recent compliance inspection conducted by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) at your firearms business located at 10595 Middle Port LA, White Plains, MD 20695, from February 5-28, 2018, you were cited for violations of 27 Code of Federal Regulations, Part 478. The violations were discussed with you during the inspection. A copy of the Report of Violations, ATF Form 5030.5, issued at the time of the inspection is enclosed.

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

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

Schick Sales, Inc., DBA All Pawn
Federal Firearms License Number: 8-52-017-02-9E-02055

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

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

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

Sincerely,

(b)(6)

Acting Area Supervisor
Baltimore Area Office

cc: Federal Firearms Licensing Center
Baltimore Area Office

Attachment