

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Al Uniform Sales Co., Inc. 4010 Volta Avenue, Suite 200 Brentwood, MD 20722, Prince George's	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 761025-2018-0047-B1B		
	3. PERMIT/LICENSE NUMBER 852033078J05082	4a. TARGET DATE 5/18/2018	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, 10/01/2017

8. PURPOSE/SPECIAL INSTRUCTIONS
Conduct a recall inspection after February 17, 2018.

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	5	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS	2	NO. OF TECS HITS		2112 - P.O.A.	
NO. OF TAX ADJUSTMENTS		\$ VALUE OF TAX INCREASES		2113 - COMM. AIR	
		\$ VALUE OF TAX DECREASES		2114 - RENTAL CAR	
NO. OF ASSESSMENTS		\$ VALUE OF ASSESSMENTS		2115 - GPV EXPENSES	
NO. OF CLAIMS		\$ VALUE OF CLAIMS		2116 - MISC.	
NO. OF TAX PERIODS		\$ VALUE OF TAXES VERIFIED		TOTAL \$ FOR INSP.	

11. ATF OFFICER'S RECOMMENDATION
Submitted by (b)(6) - Industry Operations Investigator
Submitted on: 05/10/2018

Viols WL ONLY and Recall Inspection

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
FEB 2018	9.00		
MAR 2018	93.00		
APR 2018	3.00		
MAY 2018	13.00		
ATF OFFICER'S SUBTOTAL	118.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	118.00		

13. REVIEW AND ROUTING	
REVIEW COMMENTS AND RECOMMENDATION Area Supervisor disagrees with the recommendation of Warning Letter and recall. The recommendation that is most appropriate is Warning Conference and recall. Although there has been minimal improvement in some violations there are still five repeat violations and an increase in the number of firearms not logged out (in a shorter period of time). A Warning Letter was issued last year, and the licensee's level of compliance has declined. It is not likely that future compliance will be gained by the issuance of another Warning Letter. Viols WC with WL and Recall <input checked="" type="checkbox"/> REVIEWED <input type="checkbox"/> CONCUR <input checked="" type="checkbox"/> SEE COMMENTS <input type="checkbox"/> FINAL DISPOSITION	REVIEW DATE 05/16/2018
SIGNATURE AND TITLE (b)(6) - Area Supervisor	

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13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

DIO concurs with Area Supervisor on a recommendation of Warning Conference and Recall Inspection.

Per the firearms administrative action policy a Warning Conference is the appropriate recommendation. During the current inspection five violations were found and cited (all repeat). The licensee failed to timely record the disposition of a firearm (b)(3)-(1)(2) instances. (b)(3)-(1)(2) firearms contained incorrect serial numbers in the A&D book. The FFL failed to report (b)(3) multiple sales of handguns and conduct a new NICS check after 30 days.

The last inspection in 2017 resulted in a Warning Letter and Recall Inspection for similar violations.

Viols WC with WL and Recall

☒ REVIEWED

☐ CONCUR

☒ SEE COMMENTS

☒ FINAL DISPOSITION

SIGNATURE AND TITLE

(b)(6) - Director of Industry Operations

REVIEW DATE

05/16/2018

ROUTING SEQUENCE AND DATE

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

CONTROL FILE POSTED DATE _____

Report of Violations

Instructions

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

Name of Proprietor AI Uniform Sales Co., Inc.	Street Address 4010 Volta Avenue, Suite 200	City Brentwood	State MD	Zip Code 20722-	County Prince George's	Page 1 of 7 Pages
License/Permit/Registry Number (If any) 852033078J05082	Expiration Date 9/1/2018	Date(s) or Period of Inspection 03/07/2017 through 03/07/2018				

Inspection Results

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

Number: 1	Date Corrections to be Made: (If not corrected immediately)
Nature of Violation: The licensee failed to ensure proper completion of forms prescribed by the heading on the ATF F 4473 and the instructions pertaining to the form. This occurred in (b)(3) - 112 Public Law 55 125 Stat 552 instances:	Corrective Action to be Taken: For all future firearms transactions, the licensee will ensure proper completion of the ATF Forms 4473 forms as prescribed. (If not corrected immediately)
(b)(3) - 112 Public Law 55 125 Stat 552 instance item 10a was blank	
Specifically on (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)	
(b)(3) - 112 Public Law 55 125 Stat 552 instance item 22 and item 23 were blank	
Specifically on (b)(3) - 112 Public Law 55 125 Stat 552	
(b)(3) - 112 Public Law 55 125 Stat 552 instance there was an error in item 23	
(b)(3) - 112 Public Law 55 125 Stat 552	
Citation: 27 CFR 478.21(a)	

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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 initiate a new NICS check after 30 days in instances. A NICS transaction number is only valid for a period not to exceed 30 calendar days from the date that NICS was initially contacted. If the transaction is not completed within the 30 day period, the licensee shall initiate a new NICS check prior to completion of the transfer.

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

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

In the future, the licensee will ensure all NICS checks are resubmitted after 30 days prior to the transfer of firearms to nonlicensees.

Citation: 27 CFR 478.102(c)

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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:

The licensee failed to record the disposition of (b)(3) - 112 firearms. As a result of the compliance inspection, the disposition of firearms were determined by referencing the information recorded on the ATF Forms 4473.

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

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

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

In the future, The licensee will accurately and timely record the disposition dates of all firearms. For all disposition dates known, the licensee will correctly update the A&D record immediately. The license will ensure the serial number of all firearms acquired are accurately recorded.

Report of Violations

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Inspection Results

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

(b)(3) - 112 P.03 C. Law 55-112

The licensee failed to accurately record the serial number of firearms acquire (b)(3) - 112 instances.

Refer to transaction numbers:

(b)(3) - 112 P.03

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Inspection Results

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

(b)(3) - 112 Public Law

Citation: 27 CFR 478.123(d)

Report of Violations

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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:

The licensee failed to ensure proper completion of forms prescribed by the heading on the ATF F 4473 and the instructions pertaining to the form. This occurred in four instances:

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

Corrective Action to be Taken: For all future firearms transactions, the licensee will ensure proper completion of the ATF Forms 4473 forms as prescribed.
(If not corrected immediately)

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

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

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

Citation: 27 CFR 478.124(c)(1)

Report of Violations

Instructions

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Inspection Results

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

Number: 5

Nature of Violation:

Failure to prepare a report of multiple sales or other disposition whenever the licensee sells or otherwise disposes of, at one time or during any five consecutive business days, two or more pistols, or revolvers, or any combination of pistols and revolvers totaling two or more, to an unlicensed person. This occurred (b)(3) - 112 instances involving (b)(3) - 112 firearms:

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

Citation: 27 CFR 478.126(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee submitted the ATF Forms 3310.4 on March 20, 2018. In the future the licensee will ensure ATF Forms 3310.4 are timely submitted for all multiple handgun sale transactions, as required.

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

Signature and Title of ATF Officer

(b)(6)

101

Date

3/27/2018

Date

3/27/18

For Official Use Only

ATF E-Form 5030.5
Revised April 2005

FIREARMS INSPECTION REPORT

Name: A1 Uniform Sales Co Inc.
Trade Name:

UI#: 761025-2018-0047
FFL#: 8-52-033-07-8J-05082

Address: 4010 Volta Avenue, Suite 200
Brentwood, Maryland 20722

1 - Introduction

Inspection Profile:

On March 7, 2018, Industry Operations Investigators (IOI) (b)(6), initiated an unannounced firearms compliance inspection at the licensed premises of A1 Uniform Sales Co Inc. The Federal Firearms Licensee (FFL) has a Type 07, Manufacturer in Firearms Other Than Destructive Devices license. IOI (b)(6) identified and interviewed Mr. Michael Fitzmaurice, Vice President and Mr. James Phillips, Manager. The inspection period is March 7, 2017 to March 7, 2018.

Business Profile:

The licensed premises is a commercially zoned storefront located in suburban Brentwood, Maryland, at the Washington, DC line. While the business operations are primarily for law enforcement agencies, A1 Uniforms Sales Co Inc. also sells firearms to the general public. The licensee operates as an extension of A1 Uniform Supply Company, which operates a law enforcement uniform business from the licensed premises. No additional business activities are conducted at the licensed premises. The licensee is in compliance with state licensing and local zoning requirements. The licensee utilizes perimeter security including video and motion detection capabilities. A gun safe is utilized for inventory storage. Offsite storage is utilized at the (b)(4)

The primary suppliers were identified as (b)(4), (b)(4). The primary customers are law enforcement agencies. All firearms transactions conducted are for retail sales. The licensee is not a wholesaler. The licensee does not perform services under any government or Military contracts. The licensee does not conduct importing and exporting activities. The licensee is a gunsmith. The licensee occasionally conducts consignment transactions; however, none were conducted within the inspection period.

The licensee conducts business at guns shows and identified Silverado Gun Show as the primary event in which they participate. Approximately (b)(4) of firearms sales are conducted at gunshows. The licensee maintains a website www.a1uniforms.com, but does not utilize it for firearms sales. Firearms

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transactions that occur via the Internet are conducted at
www.GunBroker.com.

The licensee has maintained a Federal Firearms License (FFL) as a Manufacturer in Firearms other than Destructive Devices since, August 14, 2012 and it is appropriate for its business operations. The licensee has not manufactured any firearms since the FFL was obtained. The licensee also maintains a current Special Occupational Tax Stamp (SOT) as a manufacturer of NFA firearms. Additionally, the licensee maintains the appropriate Maryland Trader's License and Maryland Sales & Tax Use License.

In the last 12 months, the licensee acquired (b)(4) firearms (b)(4) long guns and (b)(4) handguns). The licensee disposed of (b)(4) firearms (b)(4) long guns and (b)(4) handguns) during the same period. (b)(4) of the firearms acquired and disposed during the inspection period were handguns. (b)(4) of the firearms acquired and disposed during the inspection period were long guns. There were approximately (b)(4) of transfers to nonlicensees, (b)(4) of transfers to law enforcement officers, (b)(4) of the firearms transfers FFL to FFL. Approximately (b)(4) of transfers occur at the licensed premises and approximately (b)(4) occur at Maryland state gunshows.

Ownership and Control:

A1 Uniform Sales Co. Inc. is a corporation. IOI (b)(6) verified via the Maryland Department of Assessments and Taxation (MDAT) that the business is active and in good standing. Mr. Fitzmaurice is listed as the Resident Agent for the company. Mr. Fitzmaurice and Mr. Phillips are the only Responsible Persons (RP) for the firearms business. The Federal Firearms Licensing System (FLS) is accurate and no changes are warranted. There have been no unreported changes to ownership and hidden ownership is not suspected. IOI (b)(6) queried the RPs in the Openfox database and found no prohibiting information.

Variance:

There were no variances on file and none requested during the course of this inspection.

2 - Recommendation

Viols WL ONLY and Recall Inspection

IOI (b)(6) is recommending an alternate recommendation of Viols WL ONLY and Recall Inspection. The violations, all of which are repeated offenses warrant a WC with WL and Recall Inspection. IOI (b)(6) has proposed the alternate recommendation

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Name: A1 Uniform Sales Co Inc.
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based on the reduction of violations cited and the number of occurrences for each violation. During the inspection, there were signs that the licensee is working toward achieving better compliance. There was no missing firearms from inventory. The licensee has recently created a transparent check sheet that mirrors the ATF Form 4473 that is used by both responsible persons when completing and reviewing the ATF Form 4473 to reduce errors, prior to firearms transfer (Reference Exhibit 3).

3 - Inspection History

Date of Inspection: 2/17/2017
Type of Inspection: Firearms Compliance Inspection
UI#: 761025-2017-0065
Inspection Results: Viols WL ONLY and Recall Inspection
Cited Violations: **27 CFR 478.21(a)**
The licensee failed to ensure all of the information called for in the instructions of the ATF F 4473 was entered. This occurred (b)(3) - 112 Public instances.
27 CFR 478.124(c)(1)
The licensee failed to ensure proper completion of ATF Form 4473, prior to making an over-the-counter transfer of a firearm to a non-licensee. This occurred (b)(3) - 112 Public instances.
27 CFR 478.124(c)(3)(i)
The licensee failed to verify the identity of the transferee by examining The identification document presented, and noting on the Form 4473 the type of identification used after examining the identification. This occurred (b)(3) - 112 Public instances.
27 CFR 478.125(c)(3)(iv)
The licensee failed to record on the ATF Form 4473 the date on which the licensee contacted NICS, as well as any response provided by the system. This occurred (b)(3) - 112 Public instances.
27 CFR 478.125(c)(4)
The licensee failed to record on the ATF F 4473 the firearm to be transferred by listed by the name of the manufacture, the name of the importer, the type, model, caliber or gauge, and serial number of the firearm. This occurred (b)(3) - 112 Public instance.
27 CFR 478.125(c)(5)
The licensee failed to sign and/or date the Form 4473 at the time a firearm is sold or otherwise disposed. This occurred (b)(3) - 112 Public instances.
27 CFR 478.102(c)
The licensee failed to conduct a background check (NICS) for the sale, delivery, or transfer of a firearm to any person who is not licensed. This

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occurred (b)(3) - 112 Public instance.

27 CFR 478.123(a)

The licensee failed to record the correct acquisition of a firearm in the Acquisition & Disposition record book. This occurred (b)(3) - 112 Public instances.

27 CFR 478.123(d)

The licensee failed to record the disposition of a firearm in the Acquisition and Disposition (A&D) Record Book not later than the seventh day following the date of transaction. This occurred (b)(3) - 112 Public instances and (b)(3) - 112 Public instances, firearms were missing.

27 CFR 478.126(a)

The licensee failed to report multiple sale or other disposition whenever the licensee disposes of, at one time or during any five consecutive business days, two or more pistols, or revolvers or any combination totaling two or more, to an unlicensed person. This occurred (b)(3) - 112 Public instances involving (b)(3) - 112 Public firearms.

Date of Inspection: 4/21/2008
Type of Inspection: Firearms Qualification Inspection
UI#: 761025-2012-0283
Inspection Results: Application Approved
Cited Violations: None.

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

IOI (b)(6) examined the A&D Record, which revealed (b)(3) - 112 Public open entries. IOI (b)(6) completed a 100% physical inventory count of 381 firearms. There was a difference (b)(3) - 112 Public between the A&D record and the firearms in inventory (Reference Worksheet 1).

- (b)(3) - 112 Public instances, the licensee failed to record the disposition of firearms in the required records ((27 CFR 478.123(d)) **Reference Violation 3 and Worksheet 1**).

Additionally IOI (b)(6) discovered:

- (b)(3) - 112 Public instances, the serial number of the firearms acquired were recorded incorrectly ((27 CFR 478.123(d)) **Reference Violation 3 and Worksheet 1**).

The A&D Record is maintained electronically, in accordance with ATF Ruling 2016-3. The A&D record is in the proper format; however, the required information is not accurately or timely made. The licensee acquired (b)(4) firearms during the inspection

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period and disposed of (b)(4) firearms during the inspection period. IOI (b)(6) traced 20 firearms through the required records and did not identify any signs of trafficking. A review of the A&D record did not reveal any trafficking indicators.

No thefts or losses occurred during the inspection period nor as a result of this inspection. There were no firearms with obliterated serial numbers or illegal firearms discovered during the course of the inspection.

IOI (b)(6) reviewed the standard operating procedures relevant to the A&D record and inventory:

Firearms transactions are recorded as they occur. When a firearm arrives to the premises, Mr. Phillips will open the box and verify the serial number on the firearm and against the invoice. The firearm is then logged into the computerized A&D book and firearm is issued a stock number. At the time of transfer, Mr. Phillips will enter the purchaser's information into the disposition record. The firearm is then transferred to the customer. The licensee stated that it aims to conduct at least one annual inventory and will be more mindful and doing so in the future.

5 - ATF Forms 4473 – NICS & Other Dispositions

The licensee executed 453 (450 approved and three denied) ATF Forms 4473 during the inspection period. IOI (b)(6) reviewed 100% of the forms for the inspection period. At the time of inspection, the Forms 4473 were filed chronologically by disposition date. IOI (b)(6) cited the following violations:

- The licensee failed to ensure all of the information called for in the instructions of the ATF F 4473 was entered. This occurred (b)(6) instances. ((27 CFR 478.21(a)) Reference Violation 1 and Worksheet 2).
- The licensee failed to conduct a background check (NICS) for the sale, delivery, or transfer of a firearm to any person who is not licensed. This occurred in (b)(6) instances. ((27 CFR 478.102(c)) Reference Violation 2 and Worksheet 2).
- The licensee failed to ensure proper completion of ATF Form 4473, prior to making an over-the-counter transfer of a firearm to a non-licensee. This occurred in (b)(6) instances. ((27 CFR 478.124(c)(1)) Reference Violation 4 and Worksheet 2).

The licensee does transfer firearms to other licensees. The licensee maintains a copy of the FFL of any firearms transferred to another licensee. The licensee conducts firearms transfers to various law enforcement agencies for official use. IOI (b)(6) observed that the licensee understood the Federal regulations regarding FFL to FFL transfers and law

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enforcement officer transfers. IOI (b)(6) verified that the proper procedures were followed for each transfer type.

Prior to conducting the inspection, IOI (b)(6) requested the FFL Audit Logs for the past 12 months of the inspection period, from the Maryland State Police Licensing Division for Maryland state regulated transactions. There were 281 approved firearms transactions and four firearms transactions pending review. There were no disapproved transactions for the inspection period. IOI (b)(6) compared 10 NICS Transactions Numbers (NTNs) to the ATF Forms 4473 and found no discrepancies.

Prior to conducting the inspection, IOI (b)(6) requested the FFL Audit Logs for the past 90 days of the inspection period from the ATF Violent Crime Analysis Branch for FBI NICS transactions. The FBI NICS audit logs revealed three denied, one appeal, one delayed and 30 approved transactions for the past 90 days. IOI (b)(6) compared 30 NICS Transactions Numbers (NTNs) to the ATF Forms 4473 and found no discrepancies.

IOI (b)(6) observed that the denied transactions on file for the inspection period were filed separately from the approved transactions as required.

IOI (b)(6) observed the following Standard Operating Procedures relative to ATF Forms 4473:

The licensee stated the non-licensee completes all forms prior to conducting any over the counter transactions. Once Section A is complete and signed the licensee proceeds to completing the remaining portion of the form. All forms are issued a transaction number that matches the firearm to the ATF F 4473.

6 - Multiple Sales

IOI (b)(6) obtained a multiple sale report form the Violent Crime Analysis Branch (VCAB), and there were (b)(3) reported multiple handgun sales involving (b)(3) firearms during the inspection period. During the course of the inspection, IOI (b)(6) discovered (b)(3) - 112 unreported multiple sales involving (b)(3) - 112 handguns. IOI (b)(6) verified that the licensee submitted the completed ATF Forms 3310.4 during the course of the inspection.

The licensee failed to report multiple sale or other disposition whenever the licensee disposes of, at one time or during any five consecutive business days, two or more pistols, or revolvers or any combination totaling two or more, to an unlicensed person. This occurred (b)(3) - 112 P008 instances involving (b)(3) - 112 Public Law 55 125 firearms. ((27 CFR 478.126a) Reference Violation 5 and Worksheet 2).

7 - Suspicious/Prohibited Purchasers

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There were no suspicious or prohibited purchasers identified during the course of this inspection

8 - Trace Activity

There was ^{(b)(3) - 112} successful trace to the licensee during the inspection period and no unsuccessful traces.

9 - NFA/Importer/Collector/Manufacturer

The licensee holds an active SOT to manufacture in NFA firearms. The National Firearms Registration and Transfer Record (NFRTR) shows ^{(b)(3) - 2} firearms registered to the licensee. A complete physical inventory was conducted. All NFA firearms were accounted for.

All NFA firearms are transferred lawfully.

IOI ^{(b)(6)} did discover a NFA firearm that was not registered to the licensee on the NFRTR ^{(b)(3) - 26 USC 6103}. The licensee provided IOI ^{(b)(6)} with a copy of the approved ATF Form 3 (Reference Exhibit 2). On March 30, 2018, IOI ^{(b)(6)} forwarded the information via email to the Industry Processing Branch.

The licensee is a Type 07, Manufacture of Firearms Other Than Destructive Devices; however, the licensee does not manufacture any firearms. There were no firearms manufactured during the inspection period and no manufactured firearms were in inventory. IOI ^{(b)(6)} requested the Annual Firearms Manufacturing and Exportation Report (AFMER) and there were no firearms listed. The AFMER was timely submitted. The licensee is not currently registered with the Department of State, Directorate of Defense Trade Control (DDTC). The licensee informed IOI ^{(b)(6)} that they have contacted DDTC and have been advised that registration is not necessary as they have not conducted any manufacturing activities. The licensee further stated that they do not intend to manufacture any firearms but would like to retain the type 07 FFL as it allows for easier business transactions with both Law Enforcement Agencies and other licensed manufactures

10 - Referrals

No referrals were generated during the course of this inspection.

11 - Other

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None.

12 - Closing Actions

On March 27, 2018, IOI (b)(6) conducted a review of the Federal firearms regulations with Responsible Persons, Michael Fitzmaurice, Vice President, and James Phillips, Manager, utilizing the Acknowledgement of Federal Firearms Regulations worksheet. IOI (b)(6) and Mr. Fitzmaurice signed and dated the form (Reference Exhibit 1). IOI (b)(6) also reviewed the issued Report of Violations (ROV) with the RPs. IOI (b)(6) and Mr. Fitzmaurice signed and dated the form (Reference Report of Violations).

On May 24, 2018, IOI (b)(6) and Area Supervisor (AS) (b)(6) conducted a Warning Conference with Mr. Fitzmaurice and Mr. Phillips. IOI (b)(6) issued and reviewed an amended ROV with Mr. Fitzmaurice. IOI (b)(6) and Mr. Fitzmaurice signed and dated the form and Mr. Fitzmaurice was provided with a copy for his records.

IOI (b)(6) provided the RPs with a copy of a list of pertinent ATF contact numbers. IOI (b)(6) emailed RP James Phillips an electronic copy of ATF Ruling 2016-3. No other reference materials were provided. The licensee has attended past ATF FFL Seminars.

13 - Violations

1. 27 CFR 478.21(a) (REPEAT 2/17/2017)

Nature of Violation:

The licensee failed to ensure proper completion of forms prescribed by the heading on the ATF Form 4473 and the instructions pertaining to the form. This occurred in (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) instances:

In (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) instance item 10a was blank

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

In (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) instance item 22 and item 23 were blank

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

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) instance there was an error in item 23

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

Licensee Response:

FIREARMS INSPECTION REPORT

Name: A1 Uniform Sales Co Inc.
Trade Name:

UI#: 761025-2018-0047
FFL#: 8-52-033-07-8J-05082

The licensee stated the forms will be reviewed multiple times for accuracy.

Corrective Action:

For all future firearms transactions, the licensee will ensure proper completion of the ATF Forms 4473 forms as prescribed.

Reference Worksheet 2

2. 27 CFR 478.102(c) (REPEAT 2/17/17)

Nature of Violation:

Failure to initiate a new NICS check after 30days. A NICS transaction number is only valid for a period not to exceed 30 calendar days from the date that NICS was initially contacted. If the transaction is not completed within the 30-day period, the licensee shall initiate a new NICS check prior to completion of the transfer.

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

Licensee Response:

The licensee stated he believed all NICS checks were valid 30 days from the response date, not the transmittal date.

Corrective Action:

In the future, the licensee will ensure all NICS checks are resubmitted after 30 days prior to the transfer of firearms to nonlicensees.

Reference Worksheet 2

3. 27 CFR 478.123(d) (REPEAT 2/17/17)

Nature of Violation:

Failure to record the disposition, and the date such disposition was made. This occurred in instances:

Refer to transaction numbers:

(b)(3) - 112 Public Law 55 125

FIREARMS INSPECTION REPORT

Name: A1 Uniform Sales Co Inc.
Trade Name:

UI#: 761025-2018-0047
FFL#: 8-52-033-07-8J-05082

(b)(3) - 112 Public Law 55-125



The licensee failed to accurately record the serial number of firearms acquired instances.

Refer to transaction numbers:

(b)(3) - 112 Public Law 55-125



FIREARMS INSPECTION REPORT

Name: A1 Uniform Sales Co Inc.
Trade Name:

UI#: 761025-2018-0047
FFL#: 8-52-033-07-8J-05082

(b)(3) - 112 Public Law

Licensee Response:

The licensee stated some firearms were overlooked when swapping bound books and not logged out correctly or timely.

Corrective Action:

In the future, The licensee will accurately and timely record the disposition dates of all firearms. For all disposition dates known, the licensee will correctly update the A&D record immediately. The license will ensure the serial number of all firearms acquired are accurately recorded. On March 27, 2018, IOI (b)(6) verified that the licensee updated records to reflect accurate disposition information, including name and address, and/or ATF Form 4473 number, and disposition dates. IOI (b)(6) also verified at this time that serial numbers were accurately corrected in the A&D log entries.

Reference Worksheet 1

4. 27 CFR 478.124(c)(1) (REPEAT 2/17/17)

Nature of Violation:

The licensee failed to ensure proper completion of forms prescribed by the heading on the ATF F 4473 and the instructions pertaining to the form. This occurred (b)(3) - 112 Public instances:

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

Licensee Response:

The licensee stated more than one person would review going forward all forms prior to filing.

Corrective Action:

FIREARMS INSPECTION REPORT

Name: A1 Uniform Sales Co Inc.
Trade Name:

UI#: 761025-2018-0047
FFL#: 8-52-033-07-8J-05082

For all future firearms transactions, the licensee will ensure proper completion of the ATF Forms 4473 forms as prescribed.

Reference Worksheet 2

5. 27 CFR 478.126(a) (REPEAT 2/17/17)

Nature of Violation:

Failure to prepare a report of multiple sales or other disposition whenever the license sells or otherwise disposes of, at one time or during any five consecutive business days, two or more pistols, or revolvers, or any combination of pistols and revolvers totaling two or more, to an unlicensed person. This occurred in [REDACTED] instances involving [REDACTED] firearms:

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



Licensee Response:

The licensee stated there was an oversight in not preparing the forms. Stated that they are reminded to complete the ATF Form 3310.4 on Maryland State Regulated transactions as the process is automated and a notification is given thus he is unaware how the submissions were missed.

Corrective Action:

The licensee submitted the ATF Forms 3310.4 on March 20, 2018. In the future, the licensee will ensure ATF Forms 3310.4 are timely submitted for all multiple handgun sale transactions, as required. IOI (b)(6) verified the submission of the ATF Forms 3310.4 on March 27, 2018.

Reference Worksheet 2.

FIREARMS INSPECTION REPORT

Name: A1 Uniform Sales Co Inc.
Trade Name:

UI#: 761025-2018-0047
FFL#: 8-52-033-07-8J-05082

X

Industry Operations Investigator

Index of Worksheets and Exhibits

Worksheet 1: Inventory & A&D Review 3/27/18

Worksheet 2: ATF Form 4473 Review 3/27/18

Exhibit 1: Acknowledgement of Federal Firearms Regulations 3/27/18

Exhibit 2: Approved ATF Form 10/25/16

Exhibit 3: ATF Form 4473 Completion Worksheet



U.S. Department of Justice

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

May 17, 2018

www.atf.gov

761025 (b)(6)
5370

A1 Uniform Sales Co., Inc.
Attention: Mr. Michael Fitzmaurice
4010 Volta Avenue, Suite 200
Brentwood, Maryland 20722

Re: Federal Firearms License Number: 8-52-033-07-8J-05082

Dear Mr. Fitzmaurice:

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 4010 Volta Avenue, Suite 200 Brentwood, Maryland 20722 from March 7, 2018 through March 27, 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.

You should be aware that any willful violations of the Gun Control Act may result in revocation of your Federal firearms license. As a result of the recently cited violations, it is important that we have a meeting with you to discuss the violations found. The conference will be held in the Hyattsville Field Office located at 10210 Greenbelt Road, Suite 770, Lanham-Seabrook, Maryland 20706, on May 24, 2018, at 10am. The agenda for the meeting will include a discussion of the reasons for the violations, a review of the legal requirements, and a discussion of steps to be taken by you to ensure future compliance. Although not required, legal counsel may assist you at your own expense if you so choose. **Please bring with you documentation verifying the corrective action you have taken and any compliance plan you have developed to ensure these violations do not recur.**

Also, you are hereby notified that, pursuant to 18 U.S.C. § 930(a), no person may bring a firearm or other dangerous weapon into an ATF office. Possession of a firearm or other dangerous weapon in an ATF office may result in a fine of \$100,000 or imprisonment for not more than one year or both.

A1 Uniform Sales Co., Inc.

Federal Firearms License Number: 8-52-033-07-8J-05082

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

We will conduct a follow-up inspection in the future. Any violations, either repeat or otherwise, could be viewed as willful and may result in the revocation of your license.

Please contact Industry Operations Investigator (b)(6) or me at (b)(6) (b)(6) to confirm this appointment, and to ask any questions you may have regarding this conference. We look forward to meeting with you to resolve these issues.

(b)(6)

Area Supervisor
Baltimore Field Office

c: Federal Firearms Licensing Center
Baltimore Area Office

Attachment



U.S. Department of Justice

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

May 25, 2018

www.atf.gov

761025: (b)(6)
5370

A1 Uniform Sales Co., Inc.
Attention: Mr. Michael Fitzmaurice
4010 Volta Avenue, Suite 200
Brentwood, MD 20722

Re: Federal Firearms License Number: 8-52-033-07-8J-05082

Dear Mr. Fitzmaurice:

This letter is a follow-up to the warning conference held with you on May 24, 2018. During this conference, the violations cited during the inspection conducted on March 7, 2018 through March 27, 2018 and the necessary corrective action to prevent the violations from reoccurring were discussed. In attendance at this meeting, representing the ATF Baltimore Field Division, were Area Supervisor (b)(6) and Industry Operations Investigator (IOI) (b)(6). In attendance, representing the licensee, at this meeting was Michael Fitzmaurice and James Phillips.

You were given the opportunity to comment on the violations and what specific action you have taken to ensure that the violations will not reoccur. With respect to the violations cited below, we are providing a summary of your response to each violation:

- (1.) **Violation of 27 CFR 478.21(a):** "On three ATF Forms 4473 (2016 edition), the licensee failed to ensure proper completion of forms prescribed by the heading on the ATF Form 4473 and the instructions pertaining to the form.
 - (b)(3) - 112 Public Law instance, item 10a (Ethnicity) was blank.
 - (b)(3) - 112 Public Law instance, item 22 (Transferee's/Buyer's Signature) and item 23 (Recertification Date) were blank.
 - (b)(3) - 112 Public Law instance, there was an error recorded in item 23 (Recertification Date).

During the conference, Mr. Fitzmaurice stated that the severity of this violation is understood and he will ensure repeat violations do not occur. Mr. Phillips stated a double proofreading

A1 Uniform Sales Co., Inc.
Federal Firearms License Number: 8-52-033-07-8J-05082

system has been implemented. Additionally, Mr. Phillips stated that ATF Forms 4473 will be collected and reviewed immediately after firearms are transferred or at the end of each business day to circumvent distractions caused during the course of business. Mr. Fitzmaurice further stated that A1 Uniform Sales Co., Inc. would utilize a template to reduce errors on the ATF Forms 4473. AS (b)(6) stated the proofreading should occur before the transferee of the firearm leaves the store with the firearm, otherwise correction of the ATF Form 4473 will be difficult in sections where the customer made errors. AS (b)(6) added that while a template is accurate in reducing errors when information is omitted, a template cannot determine errors in accuracy of information. AS (b)(6) concluded that ATF Forms 4473 should be reviewed for accuracy prior to the use of the template to check for missing information on the ATF Forms 4473.

- (2.) **Violation of 27 CFR 478.102(c):** "Failure to initiate a new NICS check after 30 days. A NICS transaction number is only valid for a period not to exceed 30 calendar days from the date that NICS was initially contacted. If the transaction is not completed within the 30-day period, the licensee shall initiate a new NICS check prior to completion of the transfer."

During the conference, Mr. Phillips apologized for the oversight. He accepted responsibility for the negligence and stated that he would be more diligent in checking the NICS transaction date prior to the transfer of firearms. Mr. Phillips further stated that in regards to Maryland State Regulated transactions, there was some confusion on his part as to whether the date transmitted to the State agency or the date NICS approval was received from the State agency should be recorded on the ATF Forms 4473, item 19a. IOI (b)(6) discussed this with the licensee at the closing conference and reiterated to both Mr. Philips and Mr. Fitzmaurice during the warning conference, that the date information is transmitted to the State agency should be recorded in item 19a on the ATF Form 4473. Both responsible persons replied that they understood what date to record on the ATF Form 4473 item 19a. AS (b)(6) confirmed your understanding of these requirements.

- (3.) **Violation of 27 CFR 478.123(d):** "The licensee failed to document the disposition of (b)(6) firearms not later than seven days after the disposition occurred. As a result of the compliance inspection, it was determined that (b)(6) firearms were transferred to non-licensees. Further, the licensee failed to accurately record the serial number of firearms acquired (b)(6) instances.

In response to this violation, both Mr. Fitzmaurice and Mr. Philips acknowledged the need to do a better job at recordkeeping. Mr. Fitzmaurice stated that at the start of the business, there was not a detailed explanation of what was required to maintain the firearms records. He stated that the lack of guidance left both responsible persons with their own interpretations of how to conduct business. Mr. Fitzmaurice stated that neither he, nor Mr. Phillips had a complete understanding of how to maintain the Acquisition & Disposition Record, which resulted in the volume of errors. Mr. Phillips stated that an electronic Acquisition & Disposition record, (EGOSS), is now being utilized. Mr. Phillips stated that the EGOSS record has been utilized for a few months and that some of the disposition violations can be attributed to the electronic

A1 Uniform Sales Co., Inc.
Federal Firearms License Number: 8-52-033-07-8J-05082

records not being properly saved, which resulted in missing information for the disposition of the firearms. Mr. Phillips further stated that going forward all transactions will be recorded in the EGOSS system at the end of each business day to avoid distractions during business hours. Mr. Phillips also noted that a two-check system has been implemented where as both he and Mr. Fitzmaurice will review each acquisition and disposition entry at the end of each day. As each entry is reviewed, its corresponding ATF Form 4473 will be annotated as "2C" and the initials of the reviewer, to acknowledge that each ATF Form 4473, firearms acquisition, and firearms disposition entry were checked twice for accuracy. (b)(6) advised that continued efforts to improve the firearms recordkeeping procedures were necessary. (b)(6) stressed the importance of accurate recordkeeping as it pertains to firearms traceability. Both Mr. Fitzmaurice and Mr. Phillips concurred that they understood the importance of firearms traceability as explained by AS (b)(6) and vowed to be more compliant.

(4.) **Violation of 27 CFR 478.124(c)(1):** "O (b)(3) - 112 Public ATF Forms 4473 (2016 edition), the licensee failed to ensure proper completion of forms prescribed by the heading on the ATF Form 4473 and the instructions pertaining to the form.

- (b)(3) - 112 Public instance, item 15 (Certification Date) was blank.
- instance, item 15 (Certification Date) was incorrect.
- instance, item 12a (Country of Citizenship) was blank.
- instance, item 2 (Current State of Residence and Address Number and Street Address) was blank.

During the conference, Mr. Fitzmaurice stated that the severity of this violation is understood and he will ensure repeat violations do not occur. Mr. Phillips stated a double proofreading system has been implemented. Additionally, Mr. Phillips stated that ATF Forms 4473 will be collected and reviewed immediately after firearms are transferred or at the end of each business day to circumvent distractions caused during the course of business. Mr. Fitzmaurice further stated that A1 Uniform Sales Co., Inc. would utilize a template to reduce errors on the ATF Forms 4473. (b)(6) stated the proofreading should occur before the transferee of the firearm leaves the store with the firearm, otherwise correction of the ATF Form 4473 will be difficult in sections where the customer made errors. (b)(6) added that while a template is accurate in reducing errors when information is omitted, a template cannot determine errors in accuracy of information. (b)(6) concluded that ATF Forms 4473 should be reviewed for accuracy prior to the use of the template to check for missing information on the ATF Forms 4473.

(5.) **Violation of 27 CFR 478.126(a):** (b)(3) - 112 Public Law 55 instances, the licensee transferred two or more pistols or revolvers, or a combination of pistols and revolvers within five consecutive business days and failed to complete (and submit to ATF) the ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers). In total, (b)(3) - 112 P firearms were not reported."

In response to these, Mr. Phillips stated that he is aware of the requirement to complete the ATF Form 3310.4 anytime multiple handguns are acquired within five business days. Mr. Phillips stated that the omission of the forms was due to his negligence and that this form will be

A1 Uniform Sales Co., Inc.
Federal Firearms License Number: 8-52-033-07-8J-05082

completed. Mr. Philips stated that the double check system to review ATF Forms 4473 will help ensure that this occurs. (b)(6) stated you must ensure that any multiple handgun sale within five business days is reported.

* * *

The violations for which you were cited could adversely impact law enforcement's ability to reduce violent crime and protect the public. You are reminded that future violations, repeat or otherwise, could be viewed as willful and may result in the revocation of your license. You may anticipate further inspections to ensure your compliance.

Please contact us if you have any questions concerning your responsibilities as a licensee or if you require further clarification about particular requirements of Federal firearms laws.

Sincerely,

(b)(6)

Area Supervisor
Baltimore Field Office