

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) EG&O LLC EDINBORO OUTDOORS 211 MILL ST EDINBORO, PA 16412, ERIE	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 766060-2018-0212-B1B			
	<table border="1" style="width: 100%; border-collapse: collapse;"><tr><td style="width: 33%;">3. PERMIT/LICENSE NUMBER 825049017J06138</td><td style="width: 33%;">4a. TARGET DATE</td><td style="width: 33%;">4b. TARGET HOURS</td></tr></table>	3. PERMIT/LICENSE NUMBER 825049017J06138	4a. TARGET DATE	4b. TARGET HOURS
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	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, 12/04/2017

8. PURPOSE/SPECIAL INSTRUCTIONS
FY2018 DA-TYPE 01 FFL DE COMPLIANCE (DISCRETIONARY)

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC	10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	7	NO. OF REFERRALS		2111 - PER DIEM
NO. OF TECS CHECKS	47	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) - Senior Investigator

Submitted on: 03/01/2018

Viols WL ONLY and Recall Inspection

12. TIME ACCOUNTING DATA	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)	
DEC 2017	77.00
JAN 2018	74.00
FEB 2018	36.00
MAR 2018	2.00
ATF OFFICER'S SUBTOTAL	189.00
ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)	
DEC 2017	16.00
ATF OFFICER'S SUBTOTAL	16.00
ATF OFFICER'S SIGNATURE	
TOTAL HOURS	205.00

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13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

UI# 766060-2018-0212-B1B
FFL# 8-25-06138
Licensee: EG&O, LLC dba Edinboro Outdoors
Dates of Inspection: 12/13/2017-01/17/2018
Scope of Inspection: DE Compliance (Type 01 FFL)
Time Frame of Inspection: 01/01/2017-12/31/2017
Recommendation: Viols; ROV; WL Only; Recall
SIOI: (b)(6)

A/S Comments: From 12/13/2017-01/17/2018, SIOI (b)(6) conducted a DE Compliance Inspection at the licensed premises of EG&O, LLC dba Edinboro Outdoors. As a result of this inspection, SIOI (b)(6) cited the following 7 violations:

- 1.) 27 CFR 478.125(e)
Nature of Violation: Licensee failed to accurately and/or timely make entries in the firearms Acquisition and Disposition records (b)(3)-112 instances resulting (b)(3)-1 missing firearms.
- 2.) 27 CFR 478.21(a)
Nature of Violation: Licensee failed to obtain a properly completed ATF Form 4473 prior to the transfer of a firearm to an unlicensed person (b)(3) instances.
- 3.) 27 CFR 478.124(c)(1)
Nature of Violation: Licensee failed to obtain a properly completed ATF Form 4473 prior to the transfer of a firearm to an unlicensed person (b)(3)- instances.
- 4.) 27 CFR 478.124(c)(3)(iv)
Nature of Violation: Licensee failed to properly complete ATF Form 4473 prior to the transfer of a firearm to an unlicensed person (b)(3)- instance.
- 5.) 27 CFR 478.124(c)(4)
Nature of Violation: Licensee failed to properly complete ATF Form 4473 prior to the transfer of a firearm to an unlicensed person (b)(3)- instances.
- 6.) 27 CFR 478.124(a)
Nature of Violation: Licensee failed to execute ATF Form 4473 (b)(3)-1 instances involving the return of consigned firearms to the consignor.
- 7.) 27 CFR 478.102(a)
Nature of Violation: Licensee failed to conduct a background check through the Pennsylvania Instant Check System (PICS) (b)(3)-112 instances involving the return of consigned firearms to the consignor.

Based upon the AA Policy, SIOI (b)(6) has recommended a WL with Recall.

A/S Recommendation: Viols; ROV; WL Only; Recall based upon the following factors:

- 1.) First Compliance Inspection
- 2.) Low Deficiency Ratings. All Deficiency Ratings under 5%.
- 3.) Internal Controls in place for both inventory (Tag System, Annual Inventories) and ATF Form 4473s (secondary reviews prior to filing). Controls are in place. They appear to just need refinement.
- 4.) Willingness to implement new SOPs and refine existing SOPs in order to gain compliance
- 5.) No unreported Multiple HG Sales
- 6.) Not a significant threat to public safety. NO suspicious purchasers or firearms identified and the licensee is not a significant subject of trace activity (b)(3) - 112 Public Law 55 125 Stat 552
- 7.) A WL with Recall is in line with the current AA Policy

Viols WL ONLY and Recall Inspection

☒ REVIEWED

☒ CONCUR

☒ SEE COMMENTS

☒ FINAL DISPOSITION

SIGNATURE AND TITLE

(b)(6) - Area Supervisor



Digitally signed by Matthew S. Grim
Date: 2018.03.05 07:16:30 -05'00'

REVIEW DATE

03/05/2018

Assignment and Report

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	3. PERMIT/LICENSE NUMBER 825049017J06138	4a. TARGET DATE	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 EG&O LLC EDINBORO OUTDOORS	Street Address 211 MILL ST	City EDINBORO	State PA	Zip Code 16412-	County ERIE	Page 1 of 5 Pages
License/Permit/Registry Number <i>(If any)</i> 825049017J06138	Expiration Date 9/1/2020	Date(s) or Period of Inspection 12/13/2017 through 01/17/2018				

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:

Licensee failed to accurately and/or timely make entries in the firearms Acquisition and Disposition records § 87(2)(b) instances. Specifically:

(b)(3) - (1)(2)(3) instances, firearms were transferred to individuals on ATF F 4473 and the disposition was not recorded in the A&D records;

(b)(3) - 112 F.R. instances, firearms were transferred to other licensees and the disposition was not recorded in the A&D records;

(b)(5) - DPP instances, consignment firearms were returned to the consignor and the disposition was not recorded in the A&D records;

b(5) - 112 Pub. instance, repaired firearms were returned to the customer and the disposition was not ded in the A&D records;

b(3)-312 P.01 stances, firearms were incorrectly entered twice in the A&D records;

instances, firearms were logged out on the wrong line in the A&D records;

(b)(3) - 112 Pub. instances, firearms are not listed as disposed of in the A&D records and are missing.

Citation: 27 CFR 478.125(e)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

: Licensee will enter the correct disposition information in the A&D records and will report any missing inventory on ATF Form 3310.11.

U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives

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License/Permit/Registry Number (If any) 825049017J06138	Expiration Date 9/1/2020	Date(s) or Period of Inspection 12/13/2017 through 01/17/2018
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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:
Licensee failed to obtain a properly completed ATF Form 4473 prior to the transfer of a firearm to an unlicensed person in 4 instances. Specifically:
In (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) transferee failed to recertify the Form in Items 22 and 23 following a delayed transaction;
In (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) the Licensee recorded an incorrect number of firearms transferred in Item 29.

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

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

In the future, Licensee will ensure all ATF Forms 4473 are properly completed prior to the transfer of firearms to unlicensed persons.

Citation: 27 CFR 478.21(a)

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

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License/Permit/Registry Number (If any) 825049017J06138		Expiration Date 9/1/2020	Date(s) or Period of Inspection 12/13/2017 through 01/17/2018			

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:

Licensee failed to obtain a properly completed ATF Form 4473 prior to the transfer of a firearm to an unlicensed person (b)(3) - 11 instances. Specifically:

In (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) the transferee listed incomplete residence address information;

In (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) the transferee provided "Yes" responses to prohibiting questions in Item 11:

In (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) the transferee failed to sign and date the Form in Items 14 and 15;

In (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) the transferee provided an incorrect date in Item 15.

Citation: 27 CFR 478.124(c)(1)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

In the future, Licensee will ensure all ATF Forms 4473 are properly completed prior to the transfer of firearms to unlicensed persons.

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May 2020 Document Production

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ATF E-Form 5030 5
Revised April 2005

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

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License/Permit/Registry Number <i>(If any)</i> 825049017J06138		Expiration Date 9/1/2020	Date(s) or Period of Inspection 12/13/2017 through 01/17/2018			

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:
Licensee failed to properly complete ATF Form 4473 prior to the transfer of a firearm to an unlicensed person (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)). Specifically, the Licensee failed to enter correct Pennsylvania Instant Check System (PICS) information in Items 19a, c and d following a delayed transaction.
Citation: 27 CFR 478.124(c)(3)(iv)

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

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

In the future, Licensee will ensure all ATF Forms 4473 are properly completed prior to the transfer of firearms to unlicensed persons.

Number: 5

Nature of Violation:
Licensee failed to properly complete ATF Form 4473 prior to the transfer of a firearm to an unlicensed person in (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)). Specifically, the Licensee failed to enter the firearm information in Items 24 through 28.
Citation: 27 CFR 478.124(c)(4)

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

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

In the future, Licensee will ensure all ATF Forms 4473 are properly completed prior to the transfer of firearms to unlicensed persons.

Number: 6

Nature of Violation:
Licensee failed to execute ATF Form 4473 (b)(3) instances involving the return of consigned firearms to the consignor.
Citation: 27 CFR 478.124(a)

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

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

In the future, Licensee will ensure all ATF Forms 4473 are properly completed prior to the return of consigned firearms.

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ATF E-Form 5030 5
Revised April 2005

U.S. Department of Justice

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License/Permit/Registry Number <i>(If any)</i> 825049017J06138	Expiration Date 9/1/2020	Date(s) or Period of Inspection 12/13/2017 through 01/17/2018
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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: 7

Nature of Violation:
Licensee failed to conduct a background check through the Pennsylvania Instant Check System (PICS) instances involving the return of consigned firearms to the consignor.

Citation: 27 CFR 478.102(a)

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

Corrective Action to be Taken: In the future, Licensee will ensure all PICS checks are properly completed prior to the return of consigned firearms.
(If not corrected immediately)

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

May 2020 Document Production

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ATF E-Form 5030 5
Revised April 2005

EG&O LLC
Edinboro Outdoors
211 Mill Street
Edinboro, PA 16412

FFL #8-25-06138
UI #766060-2018-0212-B1B

1-Introduction

Inspection Profile

On December 13, 2017, ATF Senior IOI (b)(6) initiated a firearms compliance inspection at the licensed premises. ATF IOI (b)(6) assisted with the inventory verification. During the inspection, the licensee's primary contact persons were Joel Snyder and Kevin Skindell. The scope of the inspection includes firearms operations conducted from January 1, 2017 through December 31, 2017. A closing conference was held on January 17, 2018. The inspection was conducted unannounced.

Business Profile

EG&O LLC operates Edinboro Outdoors as a retail firearms dealer that also sells related hunting and fishing equipment. They have held the license since 2014. The business premises are located in Edinboro, PA, a small town approximately 15 south of Erie, PA. The setting is suburban/rural.

In the past 12 months the licensee acquired and disposed of approximately (b)(4) firearms. Edinboro Outdoors is a member of the Sports, Inc. buying group, an association of approximately 600 firearms dealers. This allows the licensee to participate in volume purchases and order directly from manufacturers. These manufacturers include (b)(4)

The licensee also acquires firearms from wholesalers, including (b)(4). Approximately (b)(4) of the firearms acquired/sold are new firearms. Long guns account for approximately (b)(4) of the licensee's sales.

The licensee conducts very limited operations at traditional gun shows. However, they have substantial sales to organizations conducting gun raffles. In most of these instances, the firearms are taken by licensee personnel to the events for display, and the firearms are returned to the premises where the winner must appear to complete the 4473 and background check. In limited instances, the firearms are transferred at the event. This only occurs if the organization sponsoring the event qualifies under 27 CFR 478.100(b).

Edinboro Outdoors conducts sales on the Internet via Gunbroker.com. They operate under the seller name "Edinboro Outdoors". Mr. Skindell estimated that in the past three years they have conducted approximately (b)(4) transactions through GunBroker. At any given time, the licensee has approximately 20-30 firearms listed on this site. The licensee also has a website (www.edinborooutdoors.com). Firearms are advertised on the

site; however, a customer must contact the store directly to arrange a purchase. The licensee holds a State license to sell firearms (#11821). They also hold a Special Occupation Tax Stamp as a dealer in NFA firearms, and they hold a (b)(7)(F)

The business premises are commercial and located in the Edinboro business district. No other business is conducted at the location. The licensee acquired an old movie theater approximately two blocks from the current location and is renovating that property with the intention of moving the store in April 2018. Mr. Skindell and Mr. Snyder were advised of the procedures to amend the FFL. There are currently no offsite storage locations.

Ownership and Control

EG&O LLC was formed in 2014, and is registered with the PA Department of State (Exhibit 1). There are four members of the LLC: Michael Okel, Timothy Parker, Kevin Skindell and Joel Snyder. All members of the LLC are listed in FLS as "partners". According to Mr. Snyder, at a meeting of the LLC members, all four individuals were given this title. Mr. Okel and Mr. Parker are affiliated with another licensee (Presque Isle Gun Shop) in Erie, PA. While Presque Isle Gun Shop is affiliated with Edinboro Outdoors, each licensee has a separate ownership structure.

There have not been any changes in ownership since the current license was issued. Hidden ownership is not suspected. All responsible persons are correctly listed in the Federal Licensing System (FLS) database. Deconfliction queries for all responsible persons did not disclose any derogatory information.

Variance

The licensee does not currently hold any variances. None were requested as a result of this inspection.

2-Recommendation

Warning Letter with Recall Inspection

3-Inspection History

This license was originally issued in August 2014. The current inspection is the licensee's first firearms compliance inspection. A review of N-Spect and Area Office files disclosed the following inspection history:

August 11, 2014 – Firearms Qualification Inspection

UI #766060-2014-0415-B1B

Inspection Results: Application Approved

Cited Violations: N/A

July 21, 2015 – Firearms Special Request Inspection

UI #766060-2015-0270-B1B

Inspection Results: Special Request Completed

Violations: The licensee requested ATF provide information related to NFA firearms procedures and recordkeeping, as they had recently obtained their Class III SOT Stamp.

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

A 100% inventory verification was completed. At the time of the inspection, there were 1,258 firearms on hand. These firearms were compared to the open entries in the A&D records, which totaled (b)(3) - 112 P001. The inventory reconciliation disclosed the following results:

Firearms transferred within prior 7 days:

It was determined nine of the firearms were transferred within the 7 days prior to the inventory reconciliation. 27 CFR 478.125(e) allots this amount of time for a dealer to make disposition entries in the records. The licensee had other documentation readily available for inspection that showed the transfer date. No violation was cited.

Firearm entered in records determined to be antique:

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

(b)(3) - 112 P001 This type of firearm was only manufactured from 1885 through 1890. As the manufacturing date is 1898 or before, the item is classified as an antique, and not subject to GCA recordkeeping requirements. No violation was cited.

Firearms transferred to individuals on ATF F 4473 and not logged out:


The following (b)(3) - 112 P001 firearms were transferred on ATF 4473 more than 7 days prior to the inventory reconciliation and no disposition entry was made. As a result, a violation of 27 CFR 478.125(e) was cited (Ref: Violation #1).

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

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




Firearms transferred to other licensees and not logged out:

The following  firearms were transferred to other licensees more than 7 days prior to the inventory reconciliation and no disposition entry was made. As a result, a violation of 27 CFR 478.125(e) was cited (Ref: Violation #1).

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




Consignment firearms returned to the consignor and not logged out:

The following  consignment firearms were returned to the consignor more than 7 days prior to the inventory reconciliation and no disposition entry was made. As a result, a violation of 27 CFR 478.125(e) was cited (Ref: Violation #1).

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



Repaired firearm returned to the customer and not logged out:

In one instance  the firearm was returned to the customer more than 7

days prior to the inventory reconciliation and no disposition entry was made. As a result, a violation of 27 CFR 478.125(e) was cited (Ref: Violation #1, Worksheet 1).

Duplicate entries

In the following ^{(b)(3)} instances, firearms were incorrectly entered twice in the A&D records. Because of this, the disposition was only recorded for one entry, with the second remaining open. As a result, a violation of 27 CFR 478.125(e) was cited (Ref: Violation #1).

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



Firearms logged out on wrong line

In the following ^{(b)(3)} instances, firearms were incorrectly logged out on the wrong line of the A&D records. As a result, a violation of 27 CFR 478.125(e) was cited (Ref: Violation #1).

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



Missing firearms

In ^{(b)(3)} instances (A&D Entries **(b)(3) - 112 Public Law 55 125 Stat 552**), the open disposition entries in the A&D books could not be resolved and the firearms are listed as missing inventory (Ref: Worksheet 1). As a result, a violation of 27 CFR 478.125(e) was cited (Ref: Violation #1). At the time of the closing conference, the licensee submitted

an ATF Form 3310.11 (Exhibit 68 – FFL Inventory Theft/Loss Report). It was confirmed through E-Trace that the report was received (Exhibit 69). This is the first theft/loss report filed by the licensee.

Generally, the licensee's A&D records are in the proper format. Although they do not list the transferee address in the Disposition portion of the records, the record does include the inventory number, which is transferred to the ATF Form 4473 and at the end of each year the Forms are filed by the transaction number. Beginning in 2018, the licensee intends to file the ATF Forms 4473 alphabetically, and is aware that they must also enter transferee address into the A&D records.

With the exception of the above noted violations, the A&D entries appear to be correct and timely. There were 25 firearms traced from the A&D records to ATF Forms 4473, and an addition 25 firearms traced from ATF Form 4473 to the A&D records. No discrepancies were observed. No trafficking issues were identified during the review of the A&D records, and no illegal firearms or obliterated serial numbers were noted during the inventory examination.

Regarding the operating procedures related to the A&D records, the licensee reportedly conducts inventory reconciliations on an annual basis. At the time of the inspection, the licensee indicated they were in the process of the year-end 2017 inventory. The A&D records contained tic marks indicative of prior inventories. It was noted most of the unrecorded dispositions cited in violation #1 occurred during 2016-2017. The licensee was encouraged to continue the practice of regular inventory reconciliations.

The overall operating procedures include a system where each firearm is assigned an A&D book number that is placed on the firearm tag and subsequently on the ATF Forms 4473. In theory, this should result in all firearms being entered in the A&D records, as a firearm without a tag number would be an indicator it was not recorded. Generally, this inspection did not disclose issues with firearm acquisition entries. The only problem area noted was the duplicate firearm entries. Currently, there are no employees designated specifically to make such entries. When firearm are delivered to the shop, it is incumbent on any salesperson present to make the required entries. Mr. Skindell and Mr. Snyder noted they have stressed the importance of entering the firearms in the books, and this may have inadvertently resulted in duplicate entries, as multiple employees entered the same firearms into the records. It was suggested that any firearm acquired be segregated in a location away from the sales floor until it is entered into the records, and it was suggested a limited number of employees be assigned this duty. It was also suggested that the person assigned the duty of entering the firearm be permitted to do so on a daily basis without interruption (e.g. – they are not expected to answer phone calls or wait on customers until the firearms are entered).

The inventory tag/number system should also assist with ensuring disposition entries are timely made. In addition, the licensee has assigned the duty of entering firearm dispositions to a single individual. ATF Form 4473s for each day are placed in a specific location at the sales counter, and the records person picks them daily and records the dispositions. It appears some of the errors related to the unrecorded dispositions for firearms sold on ATF F 4473 may have been due to the salesperson failing to annotate the Form with the inventory numbers when multiple

firearms were sold. A second area of concern is the licensee's shipment of firearms to other licensees. While Edinboro Outdoors reportedly uses a previous edition of an ATF F 4473 as a backup record noting a transfer to a licensee, this practice was inconsistent. The licensee maintains a computerized point of sale system, but not all dispositions were entered into the computer. During the inspection it was observed that Mr. Skindell was tasked with preparing the FFL transfer firearms and Gunbroker sales. This is in addition to many other duties he has, and he appeared to be frequently interrupted. It was also noted the layout of the premises is not conducive to properly recording the FFL transfers, as these firearms are not segregated well from layaway firearms, new stock, and repair firearms. In order to remedy these issues, it was suggested that a specific number of persons be assigned to complete FFL transfers, and that these persons be given uninterrupted time to perform these tasks. A walkthrough of the new location indicated an area will be set aside for the Gunbroker firearms and other transfers. A conversation with Mr. Okel disclosed that he may take over the Gunbroker duties from Mr. Skindell, and that he intends to keep a separate log of any firearms shipped to other licensees.

While 89 instances of violations related to A&D records and inventory is a cause for concern, it should be noted the licensee acquired/sold nearly 3,000 firearms in the past 12 months and has a standing inventory of in excess of 1,250 firearms. The violations represent an error rate of approximately 3% in relation to firearms acquired/sold in the past 12 months, and the rate is probably smaller as the violations mostly occurred over a two-year period. It is believed the procedures discussed above in conjunction with the proposed move to a larger location should reduce the weaknesses found in the A&D/inventory operating procedures.

5-ATF Forms 4473 –NICS & Other Dispositions

ATF Forms 4473 for the prior 12 months were reviewed. This period encompassed (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)) Forms. The following violations were found:

27 CFR 478.21(a) – Violation #2

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)) instance (Frantz) the transferee failed to recertify the Form in Item 23 following a delayed transaction and (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)) the licensee failed to correctly record the number of firearms transferred in Item 29 (Ref: Worksheet 2, Exhibit 70).

27 CFR 478.124(c)(1) – Violation #3

In (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)) instances (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)) the transferee listed incomplete residence address information (Ref: Worksheet 2, Exhibit 71). (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)) instances (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)) the transferee provided "Yes" responses to prohibiting questions in Item 11 (Ref: Worksheet 2, Exhibit 72). NCIC checks for both of these transferees indicated they are not prohibited from possessing firearms. In (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)) instances (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)) the transferee failed to sign and date the Form in Items 14 and 15 and (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)) instance (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)) the transferee provided an incorrect date in Item 15 (Ref: Worksheet 2, Exhibit 73).

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

(b)(3) - 112 Public Law 55 125 Stat 552 instance the licensee failed to properly complete ATF Form 4473 prior to the transfer of a firearm to an unlicensed person (b)(3) - 112 Public Law 55 125 Stat 552. Specifically, the licensee failed to enter correct Pennsylvania Instant Check System (PICS) information in Items 19a, c and d following a delayed transaction (Ref: Worksheet 2, Exhibit 74).

27 CFR 478.124(c)(4) – Violation #5

(b)(3) - 112 Public Law 55 125 Stat 552 instances the licensee failed to properly complete ATF Form 4473 prior to the transfer of a firearm to an unlicensed person (b)(3) - 112 Public Law 55 125 Stat 552. Specifically, the Licensee failed to enter the firearm information in Items 24 through 28 (Ref: Worksheet 2, Exhibit 75).

During the inventory reconciliation and the ATF F 4473 review, it was determined there were (b)(3) - 112 Public Law 55 125 Stat 552 instances where firearms were returned to consignors, but no ATF Forms 4473 or background checks through the Pennsylvania Instant Check System (PICS) were completed. This resulted in the following violations being cited:

27 CFR 478.124(a) – Violation #6

In the following (b)(3) - 112 Public Law 55 125 Stat 552 instances, the licensee returned firearms to a consignor without the completion of ATF Forms 4473:

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

27 CFR 478.102(a) – Violation #7

In the following (b)(3) - 112 Public Law 55 125 Stat 552 instances, the licensee returned firearms to a consignor without the completion of a PICS check:

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

During the review period, the licensee did not transfer any firearms to law enforcement officers for official duty use. Before transferring firearms to another licensee, Edinboro Outdoors is obtaining copies of the recipient's FFL and storing these copies in a separate file.

Prior to conducting the inspection, PA State Police was contacted to obtain an audit log of PICS numbers issued to the licensee. A total of 261 PICS numbers entered on ATF Forms 4473 for the month of October, 2017 were compared to the audit log. No discrepancies were noted (Ref: Exhibit 76). The licensee primarily contacts PICS through the automated online system. In addition to entering the PICS information of the ATF F 4473, the licensee also attached a

printout of the PICS results to the Form.

Regarding operating procedures related to the ATF Forms 4473, it is noted there were [REDACTED] Forms found with errors out of 2,400 examined. This represents an error rate of less than 0.6%. Overall, the licensee's current procedures related to ATF Form 4473 appear to be adequate. The salespersons appear to be diligent in ensuring the Forms are properly completed. Following a sale the Forms are double-checked prior to entering the disposition in the A&D records. One suggestion was made to strengthen the licensee's procedures. During the inspection it was observed there is usually more than one salesperson at all times. It was suggested that a second employee review a completed ATF Form 4473 at the time of the transaction before the customer leaves the store. This would ensure that any errors could be fixed immediately.

As noted in Section 4, for the years of 2017 and before the licensee was storing the current year's ATF Forms 4473 alphabetically by customer last name, and at the end of the year the Forms were reorganized by firearm inventory number. This system can be cumbersome given the number of firearms sold each year. Beginning in 2018, the licensee will begin to file the ATF Forms 4473 in chronological order.

6-Multiple Sales

An E-Trace query disclosed the licensee reported [REDACTED] multiple sales/transfers of handguns during the review period. The review of the ATF Forms 4473 found there were [REDACTED] multiple sales that were not listed in E-Trace. However, the licensee had the original ATF F 3310.4 attached to the ATF F 4473 for each instance, and a copy was present in the file of Forms faxed to ATF. It appeared the Forms might have been transmitted by Edinboro Outdoors, but not logged into E-Trace by ATF, and no violation was cited. The licensee was asked to re-transmit the Forms in question. A subsequent check of E-Trace verified the Forms were resubmitted. The licensee was advised the Forms could also be transmitted via e-mail. Overall, the licensee appears to comply with the multiple sales reporting requirements.

7-Suspicious/Prohibited Purchasers


The ATF Forms 4473 were reviewed for the purpose of determining if there were suspicious purchasers. Ten persons were identified for further checks. None of these individuals were found to have acquired firearms that were subsequently traced. In addition, four possible associates of identified purchasers were checked through NCIC and found to not be prohibited.

In addition to looking for firearms trafficking and straw purchase indicators, the review also included a list of names and addresses of persons who were denied a firearm purchase at this licensee in the past 12 months or persons who had firearms traced through this licensee. None of these individuals or individuals associated with them were found to have acquired firearms. As a result of the negative results for suspicious purchasers, no referrals were generated.

8-Trace Activity


According to E-Trace, in the last 12 months the licensee was the subject [REDACTED] firearm traces. All

firearms traces were successful (b)(3) - 112 Public Law 55 125 Stat 552, (b)(7)(E)



A secondary market analysis was conducted for used firearms. The firearms selected were generally of the type involved in crimes. Thirty-six firearms were selected for E-Trace and NCIC checks. None of the firearms selected were found to be the subject of a trace and none were reported stolen.

9-NFA/Importer/Collector/Manufacturer

In 2015 EG&O LLC obtained a Special Occupational Stamp as a Class III Dealer in Firearms (NFA). Prior to conducting the inspection, a list of firearms currently registered to the licensee in the National Firearm Registration and Transfer Record (NFRTR). This list, consisting  firearms was compared to the NFA firearms on hand. The following discrepancies were found:

(b)(3) - 26 USC 6103



Edinboro Outdoors maintains a separate A&D record for the NFA firearms. This record is in the proper format and entries appear to be timely. They also maintain a file of transfer documents for the NFA firearms. It was suggested they utilize a binder with transparent pocket inserts and maintain all documents related to each NFA firearm (i.e. – ATF Form 3, Form 4, 4473, etc.) as a single packet.

The licensee does not conduct any manufacturing or importing operations.

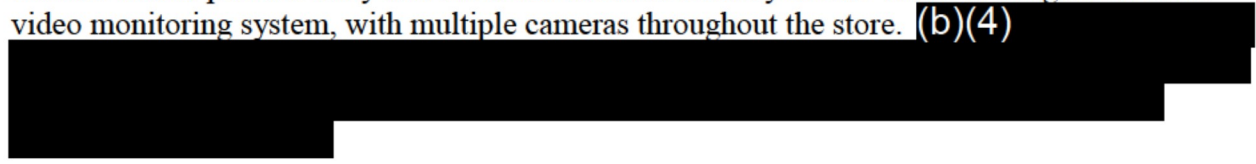
10-Referrals

No referrals were generated as a result of this inspection.

11-Other

The Youth Handgun Safety Act poster is displayed at the licensed premises and the associated pamphlets are available for distribution. The licensee also has secure gun storage/safety devices available for distribution with handguns.

Regarding security of the premises, the business is protected by an alarm system. Windows contain bars to prevent entry and the doors are steel security doors. There is a high definition video monitoring system, with multiple cameras throughout the store. (b)(4)



IOI (b)(6) visited the proposed new store location with Mr. Parker. The new premises will have similar security measures in place. Other loss prevention methods were discussed, including keeping appropriate sight lines within the store, locking stockrooms, and high security display cases for handguns. It was also noted that Edinboro Police often patrol the parking lot of both locations at night.

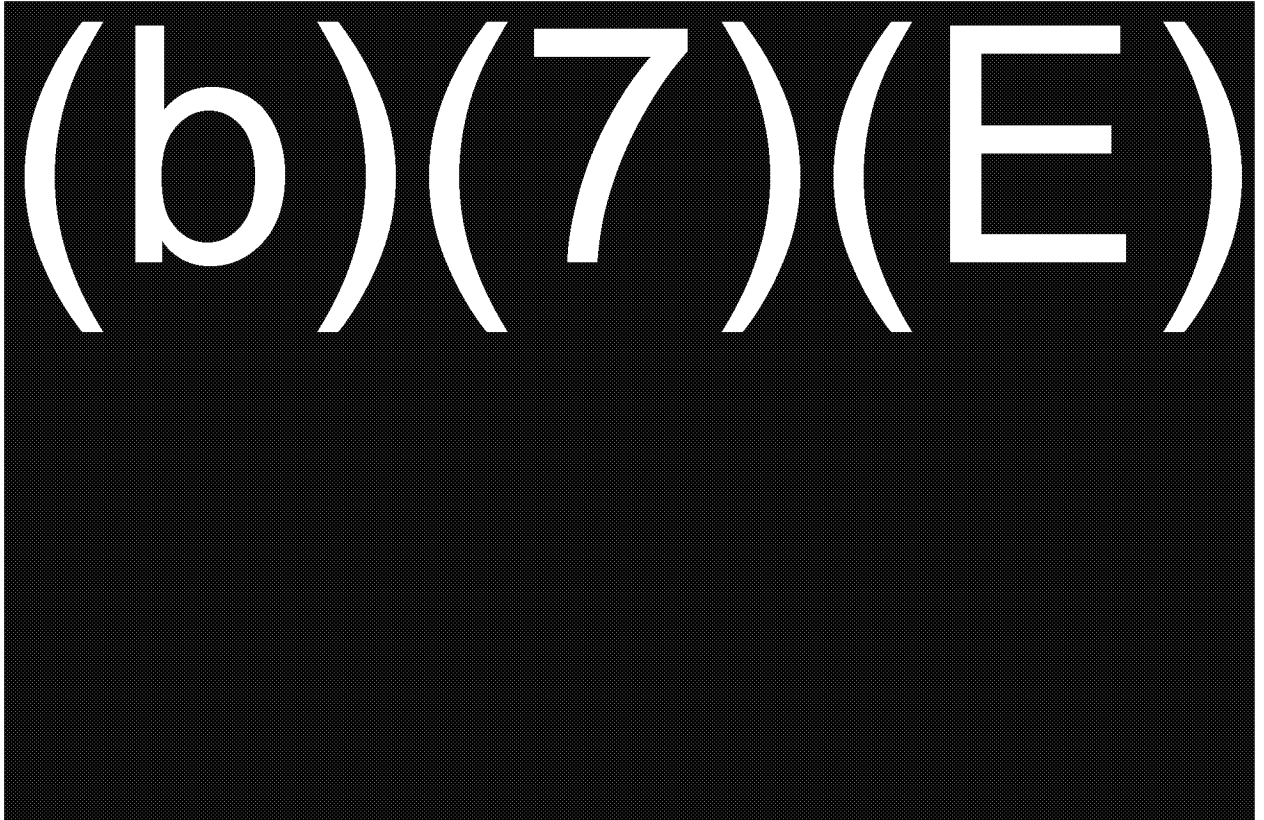
The licensee was advised of the FFL Alert system. All contact information was entered in N-Spect.

12-Closing Actions

IOI (b)(6) held a closing conference on January 17, 2018. Mr. Skindell and Mr. Snyder were present. The results of the inspection were reviewed and a Report of Violations was signed. The regulations and recordkeeping requirements were also reviewed and an Acknowledgement of Federal Firearms Regulations was completed (Exhibit 79). In addition to the closing conference, IOI (b)(6) also privately discussed the outcome of the inspection with the two other responsible persons (Mr. Parker and Mr. Okel).

This is the licensee's first compliance inspection. The thresholds identified in ATF O 5370.1C (Federal Firearms Administrative Action Policy and Procedures) for administrative action related to the violations cited are as follows:

(b)(7)(E)



Based upon the information listed above, ATF policy indicates the licensee should receive a Warning Letter. There are several possible mitigating factors. This is the licensee's first compliance inspection. The primary responsible persons (Mr. Skindell and Mr. Snyder) acquired an existing business that acquired/sold a high volume of firearms and immediately faced a high number of sales without having the opportunity to acclimate to the operations by starting small. The licensee also accepted responsibility for the actions and appeared receptive to suggested corrective action. One aggravating factor is the number of firearms that were initially unaccounted for (99) at the time of the inventory. This could have negative consequences on the traceability of firearms. Overall, neither the mitigating nor the aggravating factors indicate a recommendation outside of ATF policy is appropriate. Therefore, a Warning Letter is recommended. A recall inspection is also recommended to ensure the licensee has corrected their operating procedures to prevent recurrences of the violations.

13-Violations

1. 27 CFR 478.125(e)

Nature of violation:

Licensee failed to accurately and/or timely make entries in the firearms Acquisition and Disposition records b(7)(E)-11274 instances. Specifically:

(b)(3) - 112 P.S. instances, firearms were transferred to individuals on ATF F 4473 and the disposition was not recorded in the A&D records;

(b)(3) - 112 P.S. instances, firearms were transferred to other licensees and the disposition was not recorded in the A&D records;

(b)(3) - 112 P.S. instances, consignment firearms were returned to the consignor and the disposition was not recorded in the A&D records;

(b)(3) - 112 P.S. instance, repaired firearms were returned to the customer and the disposition was not recorded in the A&D records;

(b)(3) - 112 P.S. instances, firearms were incorrectly entered twice in the A&D records;

(b)(3) - 112 P.S. instances, firearms were logged out on the wrong line in the A&D records;

(b)(3) - 112 P.S. instances, firearms are not listed as disposed of in the A&D records and are missing.

Licensee's response:

The licensee was unable to provide a detailed response/reason for the majority of the instances. They believe the duplicate entries were the result of them stressing to the employees that firearms must be entered into the records.

Corrective action:

Licensee will enter the correct disposition information in the A&D records and will report any missing inventory on ATF Form 3310.11.

Reference Worksheet 1 and Exhibits 2-69.

2. 27 CFR 478.21(a)

Nature of violation:

Licensee failed to obtain a properly completed ATF Form 4473 prior to the transfer of a firearm to an unlicensed person in 4 instances. Specifically:

(b)(3) - 112 P.S. instance (b)(3) - 112 Public Law the transferee failed to recertify the Form in Items 22 and 23 following a delayed transaction;

(b)(3) - 112 Public Law instances (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)) the Licensee recorded an incorrect number of firearms transferred in Item 29.

Licensee's response:

The licensee indicated the errors were oversights.

Corrective action:

In the future, Licensee will ensure all ATF Forms 4473 are properly completed prior to the transfer of firearms to unlicensed persons.

Reference Worksheet 2 and Exhibit 70.

3. 27 CFR 478.124(c)(1)

Nature of violation:

Licensee failed to obtain a properly completed ATF Form 4473 prior to the transfer of a firearm to an unlicensed person in 8 instances. Specifically:

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) instances (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) the transferee listed incomplete residence address information;

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) instances (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) the transferee provided "Yes" responses to prohibiting questions in Item 11:

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) instances (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) the transferee failed to sign and date the Form in Items 14 and 15;

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) instance (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) the transferee provided an incorrect date in Item 15.

Licensee's response:

The licensee indicated the errors were oversights.

Corrective action:

In the future, Licensee will ensure all ATF Forms 4473 are properly completed prior to the transfer of firearms to unlicensed persons.

Reference Worksheet 2 and Exhibits 71-73.

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

Nature of violation:

Licensee failed to properly complete ATF Form 4473 prior to the transfer of a firearm to an unlicensed person (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) instance (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) Specifically, the Licensee failed to enter correct Pennsylvania Instant Check System (PICS) information in Items 19a, c and d following a delayed transaction.

Licensee's response:

The licensee indicated the errors were oversights.

Corrective action:

In the future, Licensee will ensure all ATF Forms 4473 are properly completed prior to the transfer of firearms to unlicensed persons.

Reference Worksheet 2 and Exhibit 74.

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

Nature of violation:

Licensee failed to properly complete ATF Form 4473 prior to the transfer of a firearm to an unlicensed person (b)(3)-112 Public instances (b)(3)-112 Public Law 55-125 total 552). Specifically, the Licensee failed to enter the firearm information in Items 24 through 28.

Licensee's response:

The licensee indicated the errors were oversights.

Corrective action:

In the future, Licensee will ensure all ATF Forms 4473 are properly completed prior to the transfer of firearms to unlicensed persons.

Reference Worksheet 2 and Exhibit 75.

6. **27 CFR 478.124(a)**

Nature of violation:

Licensee failed to execute ATF Form 4473 (b)(3)-112 instances involving the return of consigned firearms to the consignor.

Licensee's response:

The licensee indicated they were not aware of the ATF F 4473 requirements for the return of consigned firearms.

Corrective action:

In the future, Licensee will ensure all ATF Forms 4473 are properly completed prior to the return of consigned firearms.

Reference Worksheet 2 and Exhibit 41-43.

7. **27 CFR 478.102(a)**

Nature of violation:

Licensee failed to conduct a background check through the Pennsylvania Instant Check System (PICS) (b)(3)-112 instances involving the return of consigned firearms to the consignor.

Licensee's response:

The licensee indicated they were not aware of the PICS requirements for the return of consigned firearms.

Corrective action:

In the future, Licensee will ensure all PICS checks are properly completed prior to the return of consigned firearms.

Reference Worksheet 2 and Exhibit 41-43.



Index of Worksheets and Exhibits

Report of Violations

Worksheet 1 - A&D and Inventory Review Worksheet

Worksheet 2 - ATF form 4473 Review Worksheet

Exhibit 1 - PA Department of State registration of LLC

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

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



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



Exhibit 79 - Acknowledgment of Federal Firearms Regulations



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
1000 Liberty Avenue, Suite 1515
Pittsburgh, Pennsylvania 15222

www.atf.gov

February 23, 2018

766060: (b)(6)
5300

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
WARNING LETTER

EG&O, LLC
Edinboro Outdoors
211 Mill St.
Edinboro, PA 16412
ATTN: Kevin Skindell, Partner/Member & Responsible Person
RE: FFL# 8-25-049-01-7J-06138

Dear Mr. Skindell:

During a recent Compliance Inspection at your firearms business covering the period of January 1, 2017 through December 31, 2017, your company was cited for violations of 27 Code of Federal Regulations, Part 478. A copy of the Report of Violations, Form 5030.5, issued at the time of the inspection is enclosed.

As a result of this Compliance Inspection, your company was cited for the following seven (7) violations:

1.) 27 CFR 478.125(e): A&D Record Books

Nature of Violation: Licensee failed to accurately and/or timely make entries in the firearms Acquisition and Disposition records in (b)(3) - 112 Public Law 55 125 Stat 552 instances, resulting in (b)(3) - 112 Public Law 55 125 Stat 552 missing firearms.

2.) 27 CFR 478.21(a): ATF F 4473 Completion

Nature of Violation: Licensee failed to obtain a properly completed ATF Form 4473 prior to the transfer of a firearm to an unlicensed person in (b)(3) - 112 Public Law 55 125 Stat 552 instances. Specifically:

- In (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6), the transferee failed to recertify the Form in Items 22 and 23 following a delayed transaction.

- (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6), the Licensee recorded an incorrect number of firearms transferred in Item 29.

3.) 27 CFR 478.124(c)(1): ATF F 4473 Completion

Nature of Violation: Licensee failed to obtain a properly completed ATF Form 4473 prior to the transfer of a firearm to an unlicensed person (b)(3) - 112 Public Law 55 125 Stat 552 instances. Specifically:

- (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) the transferee listed incomplete residence address information.
- (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) the transferee provided "Yes" responses to prohibiting questions in Item 11.
- (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) the transferee failed to sign and date the Form in Items 14 and 15;
- (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) the transferee provided an incorrect date in Item 15.

4.) 27 CFR 478.124(c)(3)(iv): ATF Form 4473 Completion

Nature of Violation: Licensee failed to properly complete ATF Form 4473 prior to the transfer of a firearm to an unlicensed person (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) Specifically, the Licensee failed to enter correct Pennsylvania Instant Check System (PICS) information in Items 19a, c and d following a delayed transaction.

5.) 27 CFR 478.124(c)(4): ATF Form 4473 Completion

Nature of Violation: Licensee failed to properly complete ATF Form 4473 prior to the transfer of a firearm to an unlicensed person (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) Specifically, the Licensee failed to enter the firearm information in Items 24 through 28.

6.) 27 CFR 478.124(a): ATF Form 4473 Execution

Nature of Violation: Licensee failed to execute ATF Form 4473 (b)(3) - 112 Public Law 55 125 Stat 552 instances involving the return of consigned firearms to the consignor.

7.) 27 CFR 478.102(a)

Nature of Violation: Licensee failed to conduct a background check through the Pennsylvania Instant Check System (PICS) in (b)(3) - 112 Public Law 55 125 Stat 552 instances involving the return of consigned firearms to the consignor.

The violations were fully explained to you by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Senior Industry Operations Investigator (SIOI) (b)(6) You indicated that you understood the requirements of the firearms laws and regulations. You further indicated that corrective actions would be taken to eliminate future violations.

Regarding Violation #1 where you failed to properly maintain the A&D Record Book in a total of (b)(3) - 112 Public Law 55 125 Stat 552 instances resulting in (b)(3) - 112 Public Law 55 125 Stat 552 missing firearms, you attributed this violation

to a lack of attention to detail by yourself as well as your employees. In order to prevent this violation from re-occurring, please consider implementation of the following Standard Operating Procedures (SOPs):

- Inventory SOPs. SIO (b)(6) noted that you only conduct one (1) inventory each calendar year. It is strongly advised that you begin conducting more frequent, full physical inventories of the firearms on hand. These inventories should include a concurrent A&D Record Book Review to ensure that all firearms are properly accounted for and all A&D Record Book entries are complete and accurate. Frequent, full physical inventories will greatly assist you with the detection of A&D Record Book errors and omissions as well as assist with the prevention of missing/unaccounted for firearms.
- SOPs for recording of Acquisition Entries. It is suggested that any firearm acquired be segregated in a location away from the sales floor until it is entered into the A&D Record Book. Additionally, it is recommended that a limited number of employees be assigned this acquisition record entry duty. Finally, it is suggested that the employee(s) assigned this duty be permitted to do so on a daily basis without interruption (e.g. – they are not expected to answer phone calls or wait on customers until the firearms are entered).
- SOPs for recording Disposition Entries for sales to unlicensed individuals. Regarding your failure to timely record Disposition Entries in the A&D Record Book for firearms sold to unlicensed individuals on ATF Form 4473s, you attributed these omissions to salespersons failing to annotate the Form 4473s with the pertinent inventory numbers when multiple firearms are sold. Going forward, please ensure that your employees record the inventory numbers of all firearms sold in each transaction.
- SOPs for recording Disposition Entries for sales to Federal Firearms Licensees. During the inspection, SIO (b)(6) observed that you were tasked with preparing and documenting the FFL transfer firearms and Gunbroker sales. This is in addition to many other duties you have, and you appeared to be frequently interrupted by other employees, customers, and phone calls. SIO (b)(6) also noted that the layout of the premises was not conducive to properly recording the FFL transfers, as these firearms are not segregated well from layaway firearms, new stock, and repair firearms. In order to remedy these issues, it is suggested that a specific employee be assigned to complete FFL transfers and that this employee be given uninterrupted time to perform these tasks.

Regarding Violations #2-5 where you failed to complete or obtain properly completed ATF Form 4473s, again, you attributed these violations to oversights and lack of attention to detail by yourself and your employees. It is strongly recommended that you conduct more frequent audits of your ATF Form 4473s to ensure completeness and accuracy. Specifically, it is recommended that each ATF Form 4473 be reviewed by at least two (2) employees for completeness and accuracy prior to each customer leaving the licensed premises with the transferred firearm(s). Additionally, secondary audits of the ATF Form 4473s for completeness and accuracy prior to placing them to permanent file is highly recommended. Frequent audits of the ATF Form 4473s are instrumental to identifying and correcting ATF Form 4473 errors.

Regarding your failure to execute an ATF F 4473 and conduct the associated PICS Criminal Background Check (b)(3) - 112 Public Law 58 instances (Violations #6-7), you advised SIO (b)(6) that you misunderstood the Federal Firearms Regulations. You stated that you thought completion of an

ATF Form 4473 and the associated PICS Check was not required for consignment returns. Please be advised that, going forward, you must ensure that an ATF Form 4473 and the associated PICS Criminal Background Check are conducted for ALL firearms transfers, to include consignment returns, to unlicensed individuals.

The records you are required to maintain and the business operations you conduct are important to law enforcement in our continuing effort to reduce violent crime and protect the public. It is essential that you comply with all Federal laws and regulations that govern your firearms business. This is critical to carrying out our mission to protect the public and ensure that criminals do not gain access to firearms. ATF appreciates the efforts you and other industry members make in this area, and we look forward to continuing to work with you in that regard.

You are reminded that retention of your Federal Firearms License is conditioned upon your compliance with Federal laws and regulations. Any future violations, 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 the Pittsburgh Area Office at 412-395-0600.

Sincerely yours,

(b)(6)

Area Supervisor, Industry Operations
Pittsburgh III, Philadelphia Field Division

Enclosure

cc: National Licensing Center
Pittsburgh III Area Office