

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) GRAM'S ARMS INC 10 INDEPENDENCE CT NEW CITY,NY 10956, ROCKLAND	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 765060-2017-0142-B1B
	3. PERMIT/LICENSE NUMBER 613087019K00547
	4a. TARGET DATE 7/14/2017
	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE) 05/15/2017

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

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
 (b)(6), Area Supervisor, 05/19/2017

8. PURPOSE/SPECIAL INSTRUCTIONS
 Conduct DE inspection in conjunction with amended app

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	12	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.

Assignment and Report

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11. ATF OFFICER'S RECOMMENDATION

Submitted by TMHACKER - Industry Operations Investigator

SI [REDACTED] on 08/08/2017
 IO (b)(6) conducted an announced firearms compliance inspection. A closing conference was held on 07/26/2017. Gram's Arms Inc. was cited seven violations:

27 CFR 478.125(e):

Licensee failed in [REDACTED] total instances to record the acquisition of a firearm in the acquisition and disposition records in a timely manner.

27 CFR 478.124(c)(1):

Licensee failed in [REDACTED] instance to obtain a complete ATF form 4473 prior to transferring a firearm to a non-licensee.

27 CFR 478.21(a):

The licensee failed in [REDACTED] instances to conduct transfers using the appropriate ATF form 4473 (2016 version). The licensee continued to use the ATF form 4473 (2012 version) after receiving the 2016 ATF forms 4473.

27 CFR 478.102(a):

Licensee failed on [REDACTED] instance to conduct a necessary NICS background check when transferring a firearm to a non-licensee: The licensee failed to conduct a NICS check when returning [REDACTED] firearm to an individual who brought the firearm to the licensee for possible consignment.

27 CFR 478.124(a):

The licensee failed on [REDACTED] instance to execute an ATF form 4473 when transferring firearms to unlicensed individuals. The licensee failed to execute an ATF form 4473 when returning [REDACTED] firearm to a non-licensee. The non-licensee brought the firearm to the licensee for possible consignment.

27 CFR 478.129(b):

Licensee failed in [REDACTED] instance to provide ATF form 4473 where a NICS transaction number was issued.

27 CFR 478.126a:

Licensee failed in [REDACTED] instances to submit the required ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolver) form to ATF in the allotted time frame.

Viols WL ONLY and Recall Inspection

12. TIME ACCOUNTING DATA

ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)	
JUN 2017	20.00	
JUL 2017	36.00	
AUG 2017	7.00	
ATF OFFICER'S SUBTOTAL	63.00	ATF OFFICER'S SIGNATURE
TOTAL HOURS	63.00	

Assignment and Report

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13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Viols WL ONLY and Recall Inspection

REVIEWED CONCUR SEE COMMENTS FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6) - Area Supervisor	REVIEW DATE 08/07/2017
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ROUTING SEQUENCE AND DATE

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

CONTROL FILE POSTED DATE _____

Report of Violations

Instructions

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

Name of Proprietor GRAM'S ARMS INC	Street Address 10 INDEPENDENCE CT	City NEW CITY	State NY	Zip Code 10956-	County ROCKLAND	Page 1 of 4 Pages
License/Permit/Registry Number <i>(If any)</i> 613087019K00547		Expiration Date 10/1/2019	Date(s) or Period of Inspection 06/22/2016 through 06/22/2017			

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 in (b)(3) - 112 Public Law 9 instances to submit the required ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolver) form to ATF in the allotted time frame.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Each licensee shall 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: Provided, That a report need not be made where pistols or revolvers, or any combination thereof, are returned to the same person from whom they were received. The report shall be prepared on Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers. Not later than the close of business on the day that the multiple sale or other disposition occurs.

Citation: 27 CFR 478.126a

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 GRAM'S ARMS INC	Street Address 10 INDEPENDENCE CT	City NEW CITY	State NY	Zip Code 10956-	County ROCKLAND	Page 2 of 4 Pages
License/Permit/Registry Number <i>(If any)</i> 613087019K00547	Expiration Date 10/1/2019	Date(s) or Period of Inspection 06/22/2016 through 06/22/2017				

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 in [REDACTED] instance to provide ATF form 4473 where a NICS transaction number was issued. (Reference NICS transaction number [REDACTED] (b)(6) on the NICS Audit Log)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee shall retain each Form 4473 for a period of not less than 20 years after the date of sale or disposition. Where a licensee has initiated a NICS check for a proposed firearms transaction, but the sale, delivery, or transfer of the firearm is not made, the licensee shall record any transaction number on the Form 4473, and retain the Form 4473 for a period of not less than 5 years after the date of the NICS inquiry.

Citation: 27 CFR 478.129(b)

Number: 3

Nature of Violation:

The licensee failed [REDACTED] instances to conduct transfers using the appropriate ATF form 4473 (2016 version). The licensee continued to use the ATF form 4473 (2012 version) after receiving the 2016 ATF forms 4473.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The Director is authorized to prescribe all forms required by this part. All of the information called for in each form shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by this part.

Citation: 27 CFR 478.21(a)

Report of Violations

Instructions

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

Name of Proprietor GRAM'S ARMS INC	Street Address 10 INDEPENDENCE CT	City NEW CITY	State NY	Zip Code 10956-	County ROCKLAND	Page 3 of 4 Pages
License/Permit/Registry Number <i>(If any)</i> 613087019K00547		Expiration Date 10/1/2019	Date(s) or Period of Inspection 06/22/2016 through 06/22/2017			

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 on (b)(3) - 112 FC instance to conduct a necessary NICS background check when transferring a firearm to a non-licensee. The licensee failed to conduct a NICS check when returning (b)(3) - 112 FC firearm to an individual who brought the firearm to the licensee for possible consignment. (See (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6))

Citation: 27 CFR 478.102(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Except provided in paragraph (d) of 27 CFR 478.102 A licensed dealer (the licensee) shall not sell, deliver, or transfer a firearm to any other person who is not licensed unless the licensee has contacted NICS before the completion of the transfer.

Number: 5

Nature of Violation:

The licensee failed on (b)(3) - 112 FC instance to execute an ATF form 4473 when transferring firearms to unlicensed individuals.

The licensee failed to execute an ATF form 4473 when returning (b)(3) - 112 FC firearm to a non-licensee. The non-licensee brought the firearm to the licensee for possible consignment. (See (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)) D record 02/01/17).

Citation: 27 CFR 478.124(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

A licensed dealer shall not sell or otherwise dispose, temporarily or permanently, of any firearm to any person, other than another licensee, unless the licensee records the transaction on a firearms transaction record, Form 4473: Provided, That a firearms transaction record, Form 4473, shall not be required to record the disposition made of a firearm delivered to a licensee for the sole purpose of repair or customizing when such firearm or a replacement firearm is returned to the person from whom received.

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 GRAM'S ARMS INC	Street Address 10 INDEPENDENCE CT	City NEW CITY	State NY	Zip Code 10956-	County ROCKLAND	Page 4 of 4 Pages
License/Permit/Registry Number <i>(If any)</i> 613087019K00547		Expiration Date 10/1/2019	Date(s) or Period of Inspection 06/22/2016 through 06/22/2017			

Inspection Results

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

Number: 6

Nature of Violation:

licensee failed (b)(3) - 112 Public Law instance to obtain a complete ATF form 4473 prior to transferring a firearm to a non-licensee.

(b)(3) - 112 Public Law instance item 11K on ATF form 4473 was blank (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

(b)(3) - 112 Public Law instances item 11L on ATF form 4473 was blank (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

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)

Prior to making an over-the-counter transfer of a firearm to a non-licensee the licensed dealer so transferring the firearm shall obtain a Form 4473 from the transferee showing the transferee's name, sex, residence address, date and place of birth; height, weight and race of the transferee; the transferee's country of citizenship; the transferee's INS-issued alien number or admission number; the transferee's State of residence; and certification by the transferee that the transferee is not prohibited by the Act from possessing a firearm in or affecting commerce.

Number: 7

Nature of Violation:

Licensee failed (b)(3) - 112 Public Law 55 11 total instances to record the acquisition of a firearm in the acquisition and disposition records in a timely manner

Citation: 27 CFR 478.125(e)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

I Have Received a Copy of This Report of Violations <i>(Proprietor's signature and title)</i>	Date
Signature and Title of ATF Officer	Date

FIREARMS INSPECTION REPORT

Name: Gram's Arms Inc.
Trade Name:

UI#: 765060-2017-0142 B1B
FFL#: 6-13-087-01-9K-00547

Address: 10 Independence court
New City, NY 10956

1 - Introduction

Inspection Profile:

On June 22, 2017, Industry Operations Investigator (IOI) (b)(6) conducted an announced compliance inspection of Gram's Arms Inc. Advanced notice was given to assure that IOI (b)(6) could conduct multiple inspections of Gram's Arms Inc. in the same timeframe (**license amended, refer to UI: 765060-2017-0143**). Gram's Arms holds an ATF type 01 Dealer of Firearms Other than Destructive Devices license (6-13-00547). Present and interviewed was Shari Gram (President) and Vince Gram (Vice President). Both persons were identified with their New York State driver's licenses.

The inspection period was June 22, 2016 through June 22, 2017.

The inspection concluded on July 26, 2017.

Business Profile:

Gram's Arms deals handguns and long guns to the general public. The business premises is located in Vince and Shari Gram's home in New City, NY. Gram's Arms will be moving business premises' in July 2017 (**refer to UI: 765060-2017-0143**). Mr. Gram stated that the business sells (b)(4) new guns. In the last 12 months the licensee acquired (b)(4) firearms and disposed of (b)(4) firearms.

The licensee sells firearms retail only. The main suppliers of firearms are Amchar Wholesale Inc. The licensee sells firearms via the internet. The licensee's website is www.gramsarms.com. Along with the firearms business, Shari Gram works as an accountant out of the home. Gram's Arms is in possession of all necessary state and local licenses.

Gram's Arms has held the ATF type 01 license since September, 2013.

Ownership and Control:

Gram's Arms Inc. is a private corporation with two controlling members (Vince and Shari Gram). Each controlling member owns (b)(4) of the company. Vince Gram and Shari Gram are the only responsible persons on the license. No changes to the Federal Licensing System (FLS) were indicated during this inspection. No responsible persons were added to the license.

Variance:

FIREARMS INSPECTION REPORT

Name: Gram's Arms Inc.
Trade Name:

UI#: 765060-2017-0142 B1B
FFL#: 6-13-087-01-9K-00547

The licensee does not hold any variances. No variances were requested during the inspection.

2 - Recommendation

Violations, Warning Letter Only and Recall Inspection

Per the Federal Firearms Administrative Action Policy and Procedures ATF O 5370.1C a Warning Letter is recommended due to the nature of the violations.

3 - Inspection History

According to the NSPECT database, Gram's Arms has had one qualification inspection for the ATF type 01 license since 2013.

Date and Type of Inspection: 08/14/2013; Qualification inspection
UI#: 765060-2013-0274 B1B
Inspection Results: Application approved
Cited Violations: None.

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

The licensee keeps computerized A&D records. IOI Hacker conducted a 100% firearms inventory. Gram's Arms Inc. had **92** firearms in inventory at the time of inspection. Upon comparison of the inventory on hand to the A&D record, there were multiple discrepancies. There **(b)(3)-(1)2 Public Law** firearms found in inventory that were not recorded in the A&D records. There were **(b)(3)** open dispositions in the A&D records. **(27 CFR 478.125(e); Violation 1, Exhibit 1, Worksheet 1)**. Shari and Vince Gram are responsible for logging acquisitions and dispositions into the A&D records.

5 - ATF Forms 4473 – NICS & Other Dispositions

IOI **(b)(6)** reviewed all disposition records from the inspection period. The licensee keeps ATF forms 4473 filed in alphabetical order. The licensee had **(b)(3)-(1)2** ATF forms 4473 on file for the last twelve months. IOI **(b)(6)** reviewed **(b)(3)-(1)1** ATF forms 4473 for discrepancies. The licensee was cited **five** violations;

The licensee failed **(b)(3)-(1)2 Public Law** instance to obtain a complete ATF form 4473 prior to transferring a firearm to a non-licensee. **(b)(3)-(1)2 Public Law** instance item 11K was blank on ATF form 4473. **(b)(3)-(1)2 Public Law** instances item 11L was blank on ATF form 4473. **(27 CFR 478.124(c)(1); Violation 2, Exhibit 2, Worksheet 2)**.

IOI **(b)(6)** queried the **three** non-licensees **(b)(6)** **(b)(6)** through the NCIC database. No prohibiting information was found.

FIREARMS INSPECTION REPORT

Name: Gram's Arms Inc.
Trade Name:

UI#: 765060-2017-0142 B1B
FFL#: 6-13-087-01-9K-00547

The licensee failed [REDACTED] instances to conduct transfers using the appropriate ATF form 4473 (2016 version) **(27 CFR 478.21(a); Violation 3, Exhibit 3, Worksheet 2).**

The licensee failed [REDACTED] instance to conduct a necessary NICS background check as required when transferring firearms to a non-licensee. The A&D record shows that on **(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)** questioned Mr. Gram about the disposition entry, "returned". Mr. Gram stated that Mr. **(b)(6)** wanted Gram's Arms to sell the firearm for him (consignment sale). The firearm did not sell and was returned to **(b)(6)**. No NICS check was conducted **(27 CFR 478.102(a); Violation 4, Exhibit 4, Worksheet 2).**

In addition, the licensee failed to execute an ATF form 4473 **(b)(3) - 112 Public** instance when returning the (consignment) firearm to **(b)(6)** **(27 CFR 478.124(a); Violation 5, Exhibit 4, Worksheet 2).**

IOI **(b)(6)** queried **(b)(6)** through the NCIC database. No prohibiting information was found.

The licensee properly transfers firearms to other federal firearms licensees. IOI **(b)(6)** compared National Instant Criminal Background Check System (NICS) numbers from the NICS transaction audit log to the NICS transaction numbers reflected on ATF Forms 4473.

The licensee failed **(b)(3) - 112 Public** instance to maintain the ATF form 4473 on file. 66 NICS numbers were reported on the NICS transaction log. **(b)(3)** ATF forms 4473 were on file for the time period **(27 CFR 478.129(b); Violation 6, Exhibit 5, Worksheet 2).** The licensee had no denied ATF forms 4473 for the inspection period.

6 – Multiple Sales

The licensee's Violent Crime Analysis Branch master query (VCAB report) reflected zero multiple handgun sale forms were submitted during the inspection period. IOI **(b)(6)** reviewed ATF Forms 4473 for the inspection period to assure all necessary multiple sale forms were submitted.

Review revealed **(b)(3)** ATF Forms 4473 with multiple handguns listed **(b)(3) - 112 Public** handguns total). No Multiple handgun sales form was completed for the **(b)(3)** transactions. **(27 CFR 478.126a; Violation 7, Exhibit 6, Worksheet 2).** IOI **(b)(6)** verified the **(b)(3)** multiple sales forms were submitted during the inspection via email and confirmed in the ATF e-trace system.

FIREARMS INSPECTION REPORT

Name: Gram's Arms Inc.
Trade Name:

UI#: 765060-2017-0142 B1B
FFL#: 6-13-087-01-9K-00547

7 - Suspicious/Prohibited Purchasers

No suspicious/prohibited purchasers were identified during this inspection.

8 - Trace Activity

There were no traces conducted during the inspection period. There were no traces reported on the Violent Crime Analysis Branch master query.

IOI (b)(6) randomly chose **six** firearms in inventory and queried them through the ATF open fox database. No hits were found.

9 - NFA/Importer/Collector/Manufacturer

Gram's Arms does not deal in NFA firearms. The licensee does not import, manufacture, or collect firearms.

10 - Referrals

No referrals were made as a result of this inspection.

11 - Other

IOI (b)(6) queried responsible persons (**2**), Vince Gram and Shari Gram through the NCIC database. No prohibiting information was found.

12 - Closing Actions

On July 26, 2017, IOI (b)(6) the Federal Firearms Regulations with Vince Gram. IOI (b)(6) explained to Mr. Gram that Gram's Arms may not operate contrary to state or local law. Mr. Gram signed the Acknowledgement of Federal Firearms Regulations and a copy was provided (**Exhibit 7**). IOI (b)(6) also reviewed the Report of Violations with Mr. Gram. Mr. Gram signed a copy of the Report of Violations and a copy was provided (**Exhibit 8**).

13 - Violations

1. **27 CFR 478.125(e)**

Nature of Violation:

Licensee failed in (b)(3) - 112 Public Law 55 129 total instances to record the acquisition of a firearm in the acquisition and disposition records in a timely manner.

FIREARMS INSPECTION REPORT

Name: Gram's Arms Inc.
Trade Name:

UI#: 765060-2017-0142 B1B
FFL#: 6-13-087-01-9K-00547

Licensee's Response:

Mr. Gram had no response.

Corrective Action:

Each licensed dealer shall enter into a record each receipt and disposition of firearms. The purchase or other acquisition of a firearm shall, except as provided in paragraph (g) of this section, be recorded not later than the close of the next business day following the date of such purchase or acquisition. The record shall show the date of receipt, the name and address or the name and license number of the person from whom received, the name of the manufacturer and importer (if any), the model, serial number, type, and the caliber or gauge of the firearm. The sale or other disposition of a firearm shall be recorded by the licensed dealer not later than 7 days following the date of such transaction.

2. 27 CFR 478.124(c)(1)

Nature of Violation:

Licensee failed in (b)(3) - 112 Public Law instance to obtain a complete ATF form 4473 prior to transferring a firearm to a non-licensee.

(b)(3) - 112 Public Law instance item 11K on ATF form 4473 was blank (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

(b)(3) - 112 Public Law)

(b)(3) - 112 Public instances item 11L on ATF form 4473 was blank (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

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

Licensee's Response:

Mr. Gram had no response.

Corrective Action:

Prior to making an over-the-counter transfer of a firearm to a non-licensee the licensed dealer so transferring the firearm shall obtain a Form 4473 from the transferee showing the transferee's name, sex, residence address, date and place of birth; height, weight and race of the transferee; the transferee's country of citizenship; the transferee's INS-issued alien number or admission number; the transferee's State of residence; and certification by the transferee that the transferee is not prohibited by the Act from possessing a firearm in or affecting commerce.

3. 27 CFR 478.21(a)

Nature of Violation:

The licensee failed (b)(3) - 112 Public instances to conduct transfers using the appropriate ATF form 4473 (2016 version). The licensee continued to use the ATF form 4473 (2012 version)

FIREARMS INSPECTION REPORT

Name: Gram's Arms Inc.
Trade Name:

UI#: 765060-2017-0142 B1B
FFL#: 6-13-087-01-9K-00547

after receiving the 2016 ATF forms 4473.

Licensee's Response:

Mr. Gram stated "82 wow".

Corrective Action:

The Director is authorized to prescribe all forms required by this part. All of the information called for in each form shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by this part.

4. **27 CFR 478.102(a)**

Nature of Violation:

Licensee failed on [REDACTED] instance to conduct a necessary NICS background check when transferring a firearm to a non-licensee: The licensee failed to conduct a NICS check when returning [REDACTED] firearm to an individual who brought the firearm to the licensee for possible consignment. (See [REDACTED] (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6))

Licensee's Response:

For violations four and five, Mr. Gram stated "Right, ok, this is for the NICS check and the 4473."

Corrective Action:

Except provided in paragraph (d) of 27 CFR 478.102 A licensed dealer (the licensee) shall not sell, deliver, or transfer a firearm to any other person who is not licensed unless the licensee has contacted NICS before the completion of the transfer.

5. **27 CFR 478.124(a)**

Nature of Violation:

The licensee failed on [REDACTED] instance to execute an ATF form 4473 when transferring firearms to unlicensed individuals. The licensee failed to execute an ATF form 4473 when returning [REDACTED] firearm to a non-licensee. The non-licensee brought the firearm to the licensee for possible consignment. (See Scarcella A&D record 02/01/17).

Licensee's Response:

For violations four and five, Mr. Gram stated "Right, ok, this is for the NICS check and the 4473."

Corrective Action:

A licensed dealer shall not sell or otherwise dispose, temporarily or permanently, of

FIREARMS INSPECTION REPORT

Name: Gram's Arms Inc.
Trade Name:

UI#: 765060-2017-0142 B1B
FFL#: 6-13-087-01-9K-00547

any firearm to any person, other than another licensee, unless the licensee records the transaction on a firearms transaction record, Form 4473: Provided, That a firearms transaction record, Form 4473, shall not be required to record the disposition made of a firearm delivered to a licensee for the sole purpose of repair or customizing when such firearm or a replacement firearm is returned to the person from whom received.

6. **27 CFR 478.129(b)**

Nature of Violation:

Licensee failed in [REDACTED] instance to provide ATF form 4473 where a NICS transaction number was issued. (Reference NICS transaction number (b)(6) [REDACTED] dated 04/21/17 on the NICS Audit Log)

Licensee's Response:

Mr. Gram had no response.

Corrective Action:

Licensee shall retain each Form 4473 for a period of not less than 20 years after the date of sale or disposition. Where a licensee has initiated a NICS check for a proposed firearms transaction, but the sale, delivery, or transfer of the firearm is not made, the licensee shall record any transaction number on the Form 4473, and retain the Form 4473 for a period of not less than 5 years after the date of the NICS inquiry.

7. **27 CFR 478.126a**

Nature of Violation:

Licensee failed in [REDACTED] instances to submit the required ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolver) form to ATF in the allotted time frame.

Licensee's Response:

Mr. Gram stated that he believed the multiple sales form was mandatory for five or more handguns sold in a seven day period.

Corrective Action:

Each licensee shall 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: Provided, That a report need not be made where pistols or revolvers, or any combination thereof, are returned to the same person from whom they were received. The report shall be prepared on Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers. Not later than the close of business on the day that the multiple sale or other disposition

FIREARMS INSPECTION REPORT

Name: Gram's Arms Inc.
Trade Name:

UI#: 765060-2017-0142 B1B
FFL#: 6-13-087-01-9K-00547

occurs.

 Expired certificate

X (b)(6)

(b)(6)

Industry Operations Investigator

Signed by: (b)(6)

Index of Worksheets and Exhibits

Exhibits:

1. Firearms in inventory (not logged in A&D records)
2. Incomplete ATF forms 4473
3. Incorrect version of ATF forms 4473 (example)
4. (b)(6), (b)(7)(C)
5. NICS audit log
6. ATF forms 4473 (Multiple sale)
7. Acknowledgement of regulations
8. Report of violations

Worksheets:

1. Inventory A&D
2. Worksheet 2-4473 (2012 version)
3. Worksheet 2-4473 (2016 version)