

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Kramer, Robert Edwin Jr. 1019 HUDSON ROAD CAMBRIDGE, MD 21613, DORCHESTER		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 761025-2017-0287-B1B		
		3. PERMIT/LICENSE NUMBER 852019018L12393	4a. TARGET DATE 7/19/2017	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, 05/19/2017				
8. PURPOSE/SPECIAL INSTRUCTIONS Conduct a full scope firearms compliance inspection. Determine if the FFL wishes to continue to hold Type 01 and 07 FFLs. Assignment is issued in conjunction with a change of address for the same license.				
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	20	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) - IO Investigator Submitted on: 09/05/2017 Viols WL ONLY and No Recall Inspection				
12. TIME ACCOUNTING DATA				
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)				
JUL 2017		24.00		
AUG 2017		5.00		
SEP 2017		2.50		
ATF OFFICER'S SUBTOTAL		31.50	ATF OFFICER'S SIGNATURE	
TOTAL HOURS		31.50		
13. REVIEW AND ROUTING				
REVIEW COMMENTS AND RECOMMENDATION Violations, Warning Letter, and recall inspection recommended. Based on the nature of the violations it is believed that a recall inspection is appropriate to ensure future compliance. Viols WL ONLY and Recall Inspection				
<input checked="" type="checkbox"/> REVIEWED <input type="checkbox"/> CONCUR <input checked="" type="checkbox"/> SEE COMMENTS <input checked="" type="checkbox"/> FINAL DISPOSITION				
SIGNATURE AND TITLE (b)(6) - Area Supervisor			REVIEW DATE 09/14/2017	

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	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

ROUTING SEQUENCE AND DATE

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

CONTROL FILE POSTED DATE _____

FIREARMS INSPECTION REPORT

Name: Robert Ed Kramer
Trade Name:

UI#: 761025-2017-0287 B1B
FFL#: 8-52-019-01-8L-12393

Address: 1019 Hudson Rd
Cambridge, MD 21613
Dorchester County

1 - Introduction

Inspection Profile:

On July 6, 2017, Industry Operations Investigator (IOI) (b)(6) initiated a firearms compliance inspection for the licensee's ATF Type 01, Dealer in Firearms Other Than Destructive Devices, Federal Firearms License (FFL), meeting with licensee Robert "Rob" Kramer at the proposed new licensed premises. Licensee Kramer is known to IOI (b)(6) since initially becoming licensed in 2015, his attendance at FFL seminars and through regular phone contact re: industry related questions. A concurrent qualification/change of address inspection was conducted for this license (See UI# 761025-2017-0293) and the ATF Type 07, Manufacturer of Firearms Other Than Destructive Devices, FFL (See UI# 761025-2017-0288); and a concurrent firearms manufacturer follow up to qualification compliance inspection was conducted for the ATF Type 07 FFL (See UI# 761025-2017-0116). The period of inspection was July 6, 2016 through July 6, 2017. IOI (b)(6) ended the on-site inspections on July 21, 2017. Advanced notice of inspection was provided, as permitted for this home dealer by Area Supervisor (b)(6), due to the licensee's later business hours and the nature of the four inspections, total, being conducted.

Business Profile:

Under this license, the licensee is a dealer and gunsmith of firearms, conducting transfers of new and used handguns and long guns to friends, family and the law enforcement community. The licensed premises is Rob Kramer's residentially zoned home and adjacent, but unattached, 2-story workshop. Firearms are stored on the second level of the workshop. A breakdown of the firearms acquired and transferred during the inspection period is below:

	Handguns	Long Guns	Repairs
Acquired	(b)(4)		
Transferred	(b)(4)		

(b)(4) of firearms (not including repairs) were transferred per retail transactions, with (b)(4) transferred under wholesale transactions; approximately (b)(4) of firearms (b)(4) were new, with (b)(4) being used. Primary suppliers include (b)(4) and police departments (due to firearms upgrades within the department/departments). The licensee does not conduct business at gun shows or over the internet at this time; the licensee

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does not have a webpage for his firearms business. The licensee owns and conducts other businesses both at the licensed premises (management of rental properties under 'Cabin Creek Properties, LLC') and at locations other than the licensed premises ('Rob Kramer Welding' in Hurlock, MD and 'Bombshell Beauty Parlour' in Cambridge, MD; note: 'Bombshell Beauty Parlour' is co-owned with the licensee's wife, (b)(6)). The licensee also holds an ATF Type 07 FFL, 8-52-12394, Maryland Sales and Use Tax License, Maryland Regulated Firearms Dealer License and Dorchester County Planning Home Occupation Permit. The licensee is in compliance with zoning. Rob Kramer has held an FFL since 2015. There are no off-site storage locations.

Ownership and Control:

Rob Kramer is a sole proprietor and is correctly reflected as the sole responsible person in FLS. There have been no unreported changes in ownership and hidden ownership is not suspected, therefore no changes are needed to FLS.

Variance:

The licensee does not hold any variances and did not request any during the inspection.

2 - Recommendation

Viols WL ONLY and No Recall Inspection

3 - Inspection History

Date of Inspection:	July 2017
Type of Inspection:	Firearms Amended Qualification Inspection (Change of Address)
UI#:	761025-2017-0293
Inspection Results:	Application Approved
Cited Violations:	None
Date of Inspection:	October 23, 2015
Type of Inspection:	Firearms Qualification Inspection
UI#:	761025-2016-0056
Inspection Results:	Application Approved
Cited Violations:	None

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

IOI (b)(6) conducted a 100% inventory. There were 55 firearms in inventory at the time of inspection, which corresponded to (b)(6) open entries in the handwritten A&D record book. There were no discrepancies. No theft or loss reports were submitted during the inspection period or as a result of the inspection. Examination of the A&D record book reflects it is in the proper format, the information is accurate and entries appear to be timely made. IOI (b)(6) traced (b)(6) firearms transferred from acquisition through disposition. No trafficking issues, obliterated serial numbers or illegal firearms were identified. Rob Kramer stated his standard operating procedures include logging firearms in the day they are received and logging them out as soon as they are transferred. The premises is located on a remote peninsula, at the end of a long, private driveway. The building which houses the firearms in inventory and records is alarmed. In addition, the licensee has a large dog. Rob Kramer is in the process of welding custom bars to install on the windows and doors. IOI (b)(6) recommended the licensee consider installing a driveway alarm to alert him when someone enters the property (entrance not visible from the buildings on the licensed premises).

5 - ATF Forms 4473 – NICS & Other Dispositions

IOI (b)(6) reviewed the (b)(6) ATF Forms 4473 on file for the inspection period. The licensee maintains forms chronologically. Upon examining the ATF Forms 4473 for completeness and accuracy, IOI (b)(6) documented (b)(6) forms as having violations. **SEE Worksheets 2 and Violations 1, 2, 3 and 4.** There were no FBI NICS audit log results to verify for this license for the 60 days preceding the inspection. For one transfer, IOI (b)(6) determined the licensee transferred a firearm to a purchaser prior to conducting a background check. **SEE Worksheet 2 and Violation 5.** The licensee has not conducted any transfers to other licensees or law enforcement agencies. The licensee has conducted transfers to law enforcement officers; however, IOI (b)(6) found (b)(6) of those transfers were not conducted correctly. **SEE Exhibit 1 and Violations 6 and 7.** The licensee advised he has no real standard operating procedures in place for completing or reviewing forms. IOI (b)(6) recommended the licensee begin conducting a review of the ATF Forms 4473 both prior to conducting the NICS check and after the transfer of the firearm. IOI (b)(6) also reviewed using the FFL EZcheck system to verify other licensees in the future. An extensive review of the requirements for law enforcement letters (in lieu of executing an ATF Form 4473 and conducting a background check) was conducted with the licensee; the licensee advised he presented the local police chiefs with the letter requirements immediately after learning the letters he accepted had been deficient.

6 - Multiple Sales

There were no reported multiple sales during the inspection period and IOI (b)(6) did not identify any unreported multiple sales.

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7 - Suspicious/Prohibited Purchasers

IOI (b)(6) did not identify any possible traffickers, straw purchasers or other suspicious purchasers. The 20 criminal history checks conducted did not produce any negative results; no prohibited persons were found, no referrals were generated.

8 - Trace Activity

The licensee has not been the subject of any traces under this license. The licensee only received used firearms from law enforcement agencies; therefore, no secondary market analysis was conducted for this inspection.

9 - NFA/Importer/Collector/Manufacturer

The licensee is not an importer or collector. Robert Kramer is licensed to conduct NFA and NFA manufacturing activities under his ATF Type 07 FFL. The information is addressed under the concurrent firearms manufacturer follow up to qualification compliance inspection under that license. (See UI# 761025-2017-0116)

10 - Referrals

No referrals were generated as a result of this inspection.

11 - Other

An amended Report of Violations was emailed to the licensee on September 5, 2017, correcting violation #2's instance count from (b)(3) 112 Public Law 9. **SEE Exhibit 2**

12 - Closing Actions

IOI (b)(6) issued the Report of Violations on August 12, 2017. Once the inspections under all licensed had concluded, IOI (b)(6) held the closing conference on July 21, 2017. A review of the regulatory requirements was conducted and the licensee and IOI (b)(6) signed the Acknowledgement of Federal Firearms Regulations at the conclusion of the review. **SEE Exhibit 3** The licensee refused most materials referenced during the review, but did accept NFA-related items and ATF Publication 5300.15, Federal Firearms Licensee Quick Reference and Best Practices Guide.

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FFL#: 8-52-019-01-8L-12393

13 - Violations

1. 27 CFR 478.21(a)

Nature of Violation: In (b)(3) 112 Pu instances, the licensee failed to furnish all of the information called for, as indicated by the headings and instructions (on or pertaining to) the ATF Form 4473, Firearms Transaction Record.

Specifically, for the 2012 Edition of the ATF Form 4473:

- * Item 18 was not completed on (b)(3) 112 forms (Firearm Type),
- * Item 30a was not completed on (b)(3) 112 forms (Number of Firearms),
- * Item 31 was not completed on (b)(3) 112 form (Trade Name and Address of Transferor) and
- * Item 32 was not completed on (b)(3) 112 form (Federal Firearms License Number of Transferor).

Licensee's Response: The licensee admit he hadn't really been checking the forms, but thought he was doing a decent job of completing the information needed in the sections he has to fill out. Rob Kramer said he would start paying more attention to the forms and would ask his wife to do a double check of them from now on. As he was advised during previous ATF seminars, IOI (b)(6) reminded the licensee how helpful it can be to check the forms from bottom to top, right to left, to avoid allowing the brain to 'auto-correct' the entries.

Corrective Action: The licensee made corrections for the incomplete entries for Items 18, 30a, 31 and 32 on July 6, 2017 and IOI (b)(6) confirmed the corrections were completed on July 12, 2017.

In the future, the licensee will ensure all of the information called for, as indicated by the headings and instructions (on or pertaining to) the ATF Form 4473, is properly furnished.

Reference Worksheet 2

2. 27 CFR 478.124(c)(1)

Nature of Violation: In (b)(3) 11 instances, the licensee failed to ensure the purchaser properly completed Section A of the ATF Form 4473 prior to proceeding with the transfer of a firearm to an unlicensed person.

Specifically, for the 2012 Edition of the ATF Form 4473:

- * Item 3 was not properly completed on (b)(3) 112 forms (Place of Birth) and
- * Item 17 was not completed on (b)(3) 112 form (Certification Date).

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Specifically, for the 2016 Edition of the ATF Form 4473:

* Item 12b was not completed on (b)(3)(112) form (Have you ever renounced your United States citizenship?),

* Item 12c was not completed on (b)(3)(112) form (Are you an alien illegally or unlawfully in the United States?) and

* Item 12d.1. was not completed on (b)(3)(112) forms (Are you an alien who has been admitted to the United States under a nonimmigrant visa?).

Licensee's Response: Again, Rob Kramer stated he thought he was doing okay on the paperwork and admit he just wasn't being careful enough. He plans to start reviewing the forms and to have his wife do a second review of the forms from now on. IOI (b)(6) reminded the licensee the ATF Form 4473 is his record, which ATF requires to be completed and maintained, but there are criminal cases in which the form becomes a reliant piece of evidence; IOI (b)(6) reminded the licensee a case can be lost if he doesn't ensure his customers are filling out the form correctly, if it later becomes part of a criminal case.

Corrective Action: The incomplete or missing entries occurred for Items the purchaser is required to complete and could not be corrected by the licensee. IOI (b)(6) encouraged the licensee to have the specified purchasers make corrections on a copy of their respective ATF Forms 4473 if contact can be made or the customer returns to purchase an additional firearm.

In the future, the licensee will ensure the purchaser properly completes Section A of the ATF Form 4473 prior to proceeding with the transfer of a firearm to an unlicensed person.

Reference Worksheets 2

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

Nature of Violation: In (b)(3)(112) instance, the licensee failed to properly complete the purchaser's identification information in Section B of the ATF Form 4473. Specifically, for the 2012 Version of the ATF Form 4473:

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

Licensee's Response: The licensee threw up his hands and said "I have no idea" and continued to state he probably got to chatting, and since he knew the guy, he just didn't realize he didn't put the information on the form. Rob Kramer vowed to do better in the future.

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Corrective Action: IOI (b)(6) encouraged the licensee to make corrections on a copy of the respective ATF Forms 4473 if contact can be made with those purchaser and the licensee obtains the required information or the purchaser returns to purchase an additional firearm.

In the future, the licensee will ensure Identification is properly entered on the ATF Form 4473.

Reference Worksheet 2

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

Nature of Violation: In (b)(3) 112 PubL instances, the licensee failed to enter NICS information on the ATF Form 4473.

Specifically, for the 2012 Version of the ATF Form 4473:

- * Item 21a was not completed on (b)(3) 112 PubL forms (NICS contact date),
- * Item 21b was not completed on (b)(3) 112 PubL form (NICS Transaction Number) and
- * Item 21c was not completed on (b)(3) 112 PubL forms (Initial NICS response).

Licensee's Response: Rob Kramer became frustrated he wasn't doing as good of a job as he thought he was doing on the forms. He's glad he prints out the echeck information, usually, and is going to continue to do that, but admit he knows he needs to do better with the forms.

Corrective Action: In instances for which the correct information was available, the licensee corrected the NICS contact date, entered the NICS transaction number or entered the initial NICS response on a copy of the respective page of the ATF Form 4473 on July 6, 2017. IOI (b)(6) verified the corrections on July 12, 2017. The balance of the errors and omissions are not correctable as the correct information is not known.

In the future, the licensee will ensure the NICS date entered corresponds to the date NICS was contacted, or the date the information was transmitted to Maryland State Police (as POC), the NICS transaction number is properly recorded and the initial NICS response is properly recorded on the ATF Form 4473.

Reference Worksheet 2

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5. **27 CFR 478.102(a)**

Nature of Violation: In one instance, the licensee transferred a firearm to an unlicensed person prior to conducting a background check on the individual. Specifically, for the 2012 Version of the ATF Form 4473:

* The licensee had no record of having conducted a background check on the purchaser prior to transferring the firearm.

Licensee's Response: Rob Kramer insists he conducted the background check, that he would never transfer a gun to someone without doing one (unless they have the right police department letter) and has no idea how he missed putting the NICS on the form. Rob Kramer pledged he would make sure he's doing everything right from now on.

Corrective Action:

The violation is not correctable as the transfer of the firearm(s) already took place. (NOTE: IOI (b)(6) conducted a background check on the purchaser and they were not prohibited from receiving or possessing the firearm at the time of transfer.)

In the future, the licensee will ensure a background check is conducted and the purchaser is not prohibited from receiving the firearm prior to transferring a firearm to an unlicensed person.

Reference Worksheet 2

6. **27 CFR 478.134(a)**

Nature of Violation: In ^{(b)(3)} instances, the licensee accepted a deficient law enforcement letter for the transfer of a firearm to a law enforcement officer (in lieu of having the purchaser complete an ATF Form 4473 and undergo a background check). Deficiencies include:

- a) the letter not being signed by the person of authority (for that officer's agency), but by other supervisory personnel,
- b) not stating the firearm will be used in official duties,
- c) not stating a records check reveals the purchasing officer has no convictions for misdemeanor crimes of domestic violence,
- d) the letter not being the original on the agency's letterhead (photocopy) and/or
- e) the letter having previously been used to acquire a firearm, and then reused for a subsequent purchase,
- f) or any combination of the five deficiencies listed.

Licensee's Response: Rob Kramer stated he just didn't know the letter had to have certain things and wrongly left it to the officer or agency to give him whatever would

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qualify. Rob Kramer stated he would immediately stop doing these transfers until he could meet with the local police chiefs to both explain what the conditions are, what the letter has to state and so they understand a new letter is needed for each officer's purchase, each time.

Corrective Action: The violation is not correctable as the transfer of the firearm(s) already took place. (NOTE: IOI (b)(6) verified the persons were officers actively employed by the departments for which letters were provided at the time the transfers took place.)

In the future, the licensee will ensure a sufficient law enforcement letter is received prior to transferring a firearm to a law enforcement officer, in lieu of having the purchaser complete an ATF Form 4473 and undergo a background check. The licensee understands the letter must contain the following elements: On agency letterhead, Signed by a person in authority within the agency (other than the officer purchasing the firearm), Stating that the officer will use the firearm in official duties, That a background check reveals the purchasing officer has no convictions for misdemeanor crimes of domestic violence. In addition, the licensee understands a letter may not be re-used; once the officer has obtained a firearm utilizing a law enforcement letter, a new letter will be required for each firearm purchase.

Reference Exhibit 1

7. 27 CFR 478.134(c)

Nature of Violation: In (b)(3) 112 FD instances, the licensee failed to retain a law enforcement letter in their permanent records documenting the transfer of a firearm to a law enforcement officer.

Licensee's Response: Rob Kramer said he knew he got the letter but doesn't know what he did with it. He reaffirmed he knows what he needs to do going forward.

Corrective Action: The violation is not correctable as the transfer of the firearm(s) already took place. (NOTE: IOI (b)(6) verified the person was an officer actively employed by the department they claimed to work for at the time the transfers took place.)

In the future, the licensee will retain law enforcement certification letters, documenting the transfer of a firearm to a law enforcement office, in compliance with 27 CFR 478.134(a), in their permanent records.

Reference Exhibit 1

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Name: Robert Ed Kramer
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X

(b)(6)

Senior Industry Operations Investigator

Index of Worksheets and Exhibits

Worksheets 2 – ATF Forms 4473 (2012 Edition) and (2016 Edition) Review Worksheets

Exhibit 1 – List of Deficient Law Enforcement Officer Transfers

Exhibit 2 – Email re: corrected ROV sent to licensee

Exhibit 3 - Signed Acknowledgment of Federal Firearms Regulations



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
31 Hopkins Plaza, Fifth Floor
Baltimore, MD 21021

September 14, 2017

www.atf.gov

761025:(b)(6)
5373

WARNING LETTER

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Robert Kramer
1019 Hudson Road
Cambridge, MD 21613
Reference: FFL # 8-52-019-01-8L-12393

Dear Mr. Kramer:

During a recent compliance inspection at your firearms business covering the period of July 6, 2016 through July 6, 2017, 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, Form 5030.5, issued at the time of the inspection is enclosed.

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

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

You are reminded that retention of your Federal firearms license is conditional upon your compliance with Federal laws and regulations. Any future violations, either repeat or otherwise,

Robert Kramer

Reference: FFL # 8-52-019-01-8L-12393

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 ATF Industry Operations Investigator (b)(6).

Sincerely,

(b)(6)

Area Supervisor
Baltimore Area Office

Enclosure: Report of Violations

c: Federal Firearms Licensing Center
Baltimore Area Office

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 Robert Edwin Kramer	Street Address 1019 Hudson Rd	City Cambridge	State MD	ZIP Code 21613	County Dorchester	Page 1 of 5 Pages
License/Permit/Registry Number (if any) 8-52-019-01-8L-12393		Expiration Date November 1, 2018	Date(s) or Period of Inspection July 5, 2016 through July 5, 2017			
Inspection Results						
An examination of your premises, records and operations has disclosed the following violations which have been explained to you:						
Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Corrections to be Made (If not corrected immediately)		
1	27 CFR 478.21(a)	In (b)(6) instances, the licensee failed to furnish or properly furnish all of the information called for, as indicated by the headings and instructions (on or pertaining to) the ATF Form 4473, Firearms Transaction Record. Specifically, for the 2012 Edition of the ATF Form 4473: <ul style="list-style-type: none"> Item 18 was not completed on (b)(6) forms (Firearm Type). Item 30a was not completed on (b)(6) forms (Number of Firearms). Item 31 was not completed on (b)(6) form (Trade Name and Address of Transferor) and Item 32 was not completed on (b)(6) form (Federal Firearms License Number of Transferor). See the following ATF Forms 4473: (b)(3) 112 Public Law 55 125 STAT 552 (b)(6)	The licensee made corrections for the incomplete entries for Items 18, 30a, 31 and 32 on July 6, 2017 and IOI (b)(6) . (b)(6) confirmed the corrections were completed on July 12, 2017. In the future, the licensee will ensure all of the information called for, as indicated by the headings and instructions (on or pertaining to) the ATF Form 4473, is properly furnished.	New protocols will be implemented immediately		
2	27 CFR 478.124(c)(1)	In (b)(6) instances, the licensee failed to ensure the purchaser properly completed Section A of the ATF Form 4473 prior to proceeding with the transfer of a firearm to an unlicensed person. Specifically, for the 2012 Edition of the ATF Form 4473: <ul style="list-style-type: none"> Item 3 was not properly completed on (b)(6) forms (Place of Birth) and Item 17 was not completed on (b)(6) form (Certification Date). Specifically, for the 2016 Edition of the ATF Form 4473: <ul style="list-style-type: none"> Item 12b was not completed on one form (Have you ever renounced your 	The incomplete or missing entries occurred for Items the purchaser is required to complete and could not be corrected by the licensee. IOI (b)(6) encouraged the licensee to have the specified purchasers make corrections on a copy of their respective ATF Forms 4473 if contact can be made or the customer returns to purchase an additional firearm.	New protocols will be implemented immediately		
I Have Received a Copy of This Report of Violations (Proprietor's signature and title)			R. H. Kramer owner	Date 7/12/2017		
Signature and Title of ATF Officer			(b)(6) IOI	Date 7/12/2017		

ATF Form 5030.8
Revised April 2004

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 Robert Edwin Kramer	Street Address 1019 Hudson Rd	City Cambridge	State MD	ZIP Code 21613	County Dorchester	Page <u>2</u> of <u>5</u> Pages
License Permit Registry Number (if any) 8-52-019-01-8L-12393		Expiration Date November 1, 2018	Date(s) or Period of Inspection July 5, 2016 through July 5, 2017			

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

Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Corrections to be Made (If not corrected immediately)
3	27 CFR 478.124(c)(3)(i)	<p>United States citizenship?).</p> <ul style="list-style-type: none"> * Item 12c was not completed on (b)(3) form (Are you an alien illegally or unlawfully in the United States?) and * Item 12d.1. was not completed on (b)(3) forms (Are you an alien who has been admitted to the United States under a nonimmigrant visa?). <p>See the following ATF Form 4473: (b)(3) 112 Public Law 55 125 STAT 552 (b)(6)</p> <p>In (b)(3) instance, the licensee failed to properly complete the purchaser's identification information in Section B of the ATF Form 4473. Specifically, for the 2012 Version of the ATF Form 4473:</p> <ul style="list-style-type: none"> * Item 20a was not properly completed on (b)(3) form (Identification). <p>See the following ATF Form 4473: (b)(3) 112 Public Law 55 125 STAT 552 (b)(6)</p> <p>(b)(6)</p>	<p>In the future, the licensee will ensure the purchaser properly completes Section A of the ATF Form 4473 prior to proceeding with the transfer of a firearm to an unlicensed person.</p> <p>IOI (b)(6) encouraged the licensee to make corrections on a copy of the respective ATF Forms 4473 if contact can be made with those purchaser and the licensee obtains the required information or the purchaser returns to purchase an additional firearm.</p> <p>In the future, the licensee will ensure Identification is properly entered on the ATF Form 4473.</p>	New protocols will be implemented immediately
4	27 CFR 478.124(c)(iv)	<p>In (b)(3) instances, the licensee failed to enter NICS information on the ATF Form 4473.</p> <p>Specifically, for the 2012 Version of the ATF Form 4473:</p> <ul style="list-style-type: none"> * Item 21a was not completed on (b)(3) 112 Forms (NICS contact date). * Item 21b was not completed on (b)(3) form (NICS Transaction Number) and 	<p>In instances for which the correct information was available, the licensee corrected the NICS contact date, entered the NICS transaction number or entered the initial NICS response on a copy of the</p>	New protocols will be implemented immediately

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 Robert Edwin Kramer	Street Address 1019 Hudson Rd	City Cambridge	State MD	ZIP Code 21613	County Dorchester	Page <u>3</u> of <u>5</u> Pages
License/Permit Registry Number (if any) 8-52-019-01-8L-12393		Expiration Date November 1, 2018	Date(s) or Period of Inspection July 5, 2016 through July 5, 2017			

Inspection Results

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

Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Corrections to be Made (If not corrected immediately)
		<p>* Item 21c was not completed on (b)(3) 112 forms (Initial NICS response). See the following ATF Form 4473: (b)(3) 112 Public Law 55 125 STAT 552 (b)(6)</p>	<p>(b)(6) respective page of the ATF Form 4473 on July 5, 2017. IOI (b)(6) verified the corrections on July 12, 2017. The balance of the errors and omissions are not correctable as the correct information is not known.</p> <p>In the future, the licensee will ensure the NICS date entered corresponds to the date NICS was contacted, or the date the information was transmitted to Maryland State Police (as POC), the NICS transaction number is properly recorded and the initial NICS response is properly recorded on the ATF Form 4473.</p>	
5	27 CFR 478.102(a)	<p>In (b)(3) instance, the licensee transferred a firearm to an unlicensed person prior to conducting a background check on the individual. Specifically, for the 2012 Version of the ATF Form 4473: * The licensee had no record of having conducted a background check on the purchaser prior to transferring the firearm.</p> <p>See the following ATF Form 4473: (b)(3) 112 Public Law 55 125 STAT 552 (b)(6)</p>	<p>The violation is not correctable as the transfer of the firearm(s) already took place.</p> <p>In the future, the licensee will ensure a background check is conducted and the purchaser is not prohibited from receiving the firearm prior to transferring a firearm to an unlicensed person.</p>	New protocols will be implemented immediately.
6	27 CFR 478.134(a)	<p>In (b)(3) instances, the licensee accepted a deficient law enforcement letter for the transfer of a firearm to a law enforcement officer (in lieu of having the purchaser complete an ATF Form 4473 and undergo a background check). Deficiencies include: a) the letter not being signed by the person of authority (for that officer's agency), but by other supervisory personnel.</p>	<p>The violation is not correctable as the transfer of the firearm(s) already took place.</p> <p>In the future, the licensee will ensure a sufficient law enforcement letter is received prior to transferring a firearm to a law</p>	New protocols will be implemented immediately.

Report of Violations

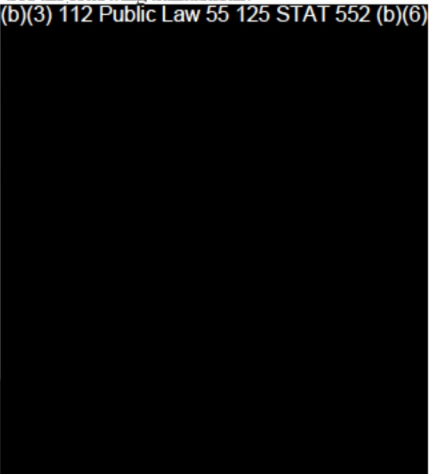
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Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Corrections to be Made (If not corrected immediately)
		<p>b) not stating the firearm will be used in official duties, c) not stating a records check reveals the purchasing officer has no convictions for misdemeanor crimes of domestic violence, d) the letter not being the original on the agency's letterhead (photocopy) and/or e) the letter having previously been used to acquire a firearm and then reused for a subsequent purchase, f) or any combination of the five deficiencies listed.</p> <p>See the following transactions: (b)(3) 112 Public Law 55 125 STAT 552 (b)(6)</p> 	<p>enforcement officer, in lieu of having the purchaser complete an ATF Form 4473 and undergo a background check. The licensee understands the letter must contain the following elements: On agency letterhead, Signed by a person in authority within the agency (other than the officer purchasing the firearm). Stating that the officer will use the firearm in official duties. That a background check reveals the purchasing officer has no convictions for misdemeanor crimes of domestic violence. In addition, the licensee understands a letter may not be re-used; once the officer has obtained a firearm utilizing a law enforcement letter, a new letter will be required for each firearm purchase.</p>	

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Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Corrections to be Made (If not corrected immediately)
7	27 CFR 478.134(c)	<p>(b)(3) 112 Public Law 55 125 STAT 552 (b)(6)</p> <p>In (b)(3) 112 instances, the licensee failed to retain a law enforcement letter in their permanent records documenting the transfer of a firearm to a law enforcement officer. See the following transactions: (b)(3) 112 Public Law 55 125 STAT 552 (b)(6)</p>	<p>The violation is not correctable as the transfer of the firearm(s) already took place.</p> <p>In the future, the licensee will retain law enforcement certification letters, documenting the transfer of a firearm to a law enforcement office, in compliance with 27 CFR 478.134(a), in their permanent records.</p>	New protocols will be implemented immediately.