

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) PARROS GUN SHOP & POLICE SUPPLIES INC 95 US RT 2 WATERBURY,VT 05676-9405, WASHINGTON	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 762055-2018-0045-B1B		
	3. PERMIT/LICENSE NUMBER 603023019K33609	4a. TARGET DATE 3/31/2018	4b. TARGET HOURS 60
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

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

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
(b)(6), Area Supervisor, 10/24/2017

8. PURPOSE/SPECIAL INSTRUCTIONS
FULL DE. (b)(3) - 112 Public Law 55 125 Stat 552

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	10	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS	55	NO. OF TECS HITS		2112 - P.O.A.	
NO. OF TAX ADJUSTMENTS		\$ VALUE OF TAX INCREASES		2113 - COMM. AIR	
		\$ VALUE OF TAX DECREASES		2114 - RENTAL CAR	
NO. OF ASSESSMENTS		\$ VALUE OF ASSESSMENTS		2115 - GPV EXPENSES	
NO. OF CLAIMS		\$ VALUE OF CLAIMS		2116 - MISC.	
NO. OF TAX PERIODS		\$ VALUE OF TAXES VERIFIED		TOTAL \$ FOR INSP.	

11. ATF OFFICER'S RECOMMENDATION
Submitted by (b)(6) - Industry Operations Investigator

Submitted on: 04/30/2018
The recommendation is based on the inspection findings and current ATF Federal Firearms Administrative Action Policy and Procedures Order (ATF O 5370.1C). The results meet the threshold and warrant a Warning Letter due to three (3) violations.

1. The licensee failed to conduct a NICS check prior to the transfer of an NFA item. (b)(3) - 112 Public Law ATF Forms 4473, the licensee transferred NFA items to an RP of a trust without conducting a NICS check. The licensee was cited for this violation under 27 CFR 478.102(a).

2. The licensee failed to conduct a new NICS check after 30 days from the initial contact with NICS on (b)(3) - 112 Public ATF Form 4473. The licensee was cited for this violation under 27 CFR 478.102(c).

3 (b)(3) - 112 Public Law 55 missing firearms after reconciliation. The licensee was cited for this violation in the A&D record under 27 CFR 478.125(e).

FLS Information needs to be updated to reflect the complete middle name of Responsible Person Henry Parro to be Earl.
Viols WL ONLY and No Recall Inspection

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
FEB 2018	44.50		
ATF OFFICER'S SUBTOTAL	44.50	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
OCT 2017	1.00		
FEB 2018	84.00		
MAR 2018	56.00		
APR 2018	27.00		

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) PARROS GUN SHOP & POLICE SUPPLIES INC 95 US RT 2 WATERBURY,VT 05676-9405, WASHINGTON	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 762055-2018-0045-B1B		
	3. PERMIT/LICENSE NUMBER 603023019K33609	4a. TARGET DATE 3/31/2018	4b. TARGET HOURS 60
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

12. TIME ACCOUNTING DATA

ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)	
MAY 2018	8.00
ATF OFFICER'S SUBTOTAL	176.00
ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)	
FEB 2018	53.00
MAR 2018	8.00
ATF OFFICER'S SUBTOTAL	61.00
ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)	
FEB 2018	58.50
MAR 2018	2.00
APR 2018	3.00
ATF OFFICER'S SUBTOTAL	63.50
ATF OFFICER'S SIGNATURE	
TOTAL HOURS	345.00

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Parro's Gun Shop & Police Supplies, Inc.
DE, 6-03-33609
IOI (b)(6)
Final N-Force query 4/11/2018, no hits.

DE inspection completed, Ten violations cited, three of which meet the threshold for a Warning Letter:

- 1.The licensee failed to conduct a NICS check prior to the transfer of an NFA item. On (b)(3) 112 PLS ATF Forms 4473, the licensee transferred NFA items to an RP of a trust without conducting a NICS check. The licensee was cited for this violation under 27 CFR 478.102(a).
- 2.The licensee failed to conduct a new NICS check after 30 days from the initial contact with NICS on (b)(3) 112 PLS ATF Form 4473. The licensee was cited for this violation under 27 CFR 478.102(c).
- 3 (b)(3) 112 Public Law 3 missing firearms after reconciliation. The licensee was cited for this violation in the A&D record under 27 CFR 478.125(e).

Please update FLS to reflect the complete middle name of Respons ble Person Henry Parro to be Earl.

Viols WL ONLY and No Recall Inspection

☒ REVIEWED ☒ CONCUR ☒ SEE COMMENTS ☒ FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6) - Area Supervisor	REVIEW DATE 04/30/2018
---	---------------------------

ROUTING SEQUENCE AND DATE

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

CONTROL FILE POSTED DATE _____

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

Address: 95 US Route 2
Waterbury, Vermont 05676-9405
Washington County

1 - Introduction

Inspection Profile:

On February 12, 2018, ATF Industry Operations Investigators (IOIs) (b)(6) initiated a full Disposition Emphasis (DE) firearms compliance inspection on Parros Gun Shop & Police Supplies Inc. located in Waterbury, Vermont. The onsite portion of the inspection was conducted on February 12-16, 2018. Henry Earl Parro, President Member of Parros Gun Shop & Police Supplies Inc. was present during the initiation of the inspection and on site during the duration of this inspection. Parro is also a Responsible Person (RP) listed on the Type 01 Dealer of Firearms License issued by ATF to Parros Gun Shop & Police Supplies Inc. Parro identified himself with a Vermont driver's license, number (b)(6). This inspection covered the period from February 12, 2017 through the date of initiation and was initiated without prior notice provided to the licensee.

Acting Resident Agent in Charge (b)(6) of the ATF Burlington, Vermont Field Office was contacted for clearance prior to commencing this inspection. IOI (b)(6) queried N-Force on February 7, 2018 and again on April 11, 2018 for RP Henry Parro, the home address of Parro, Parros Gun Shop & Police Supplies Inc. and the address of the business premises, with no results.

Business Profile:

Parros Gun Shop & Police Supplies Inc. maintains an ATF Type 01 Dealers License and is a retail storefront in Waterbury, Vermont. In addition to selling firearms, Parros sells firearm ammunition and accessories. Parros transfers a high number of "Blue Label" (LE Only) firearms to individual law enforcement officers as well as Police Departments, where the transfer of the firearms are documented on a letterhead document from the Chief Law Enforcement Officer from that department. Parros also provides gunsmithing services for customers. Parros employs approximately 12 employees on a full time and part time basis.

During the inspection period of February 12, 2017 - February 12, 2018, Parros acquired approximately (b)(4) firearms and disposed of approximately (b)(4) firearms. Of the firearms acquired, (b)(4) were GCA firearms, (b)(4) were gunsmithing and (b)(4) were NFA items. Of the firearms disposed, (b)(4) GCA firearms, (b)(4) were gunsmithing and (b)(4) were NFA items.

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

Of the GCA firearms disposed, approximately (b)(4) percent were hand guns and (b)(4) percent were long guns; of those approximately (b)(4) percent were new firearms and (b)(4) percent were used firearms. The majority of NFA items disposed were suppressors.

Parros Gun Shop & Police Supplies Inc. has a website *www.parros.com*. Parros also utilizes *gunbroker.com* to dispose of firearms. Parros performs transfers for non-licensees, where the acquisition of the firearm is from other Federal firearm licensees. Parros acquires firearms from numerous distributors such as (b)(4). Parros does wholesale a small percentage (>5 percent) of firearms. Parros does conduct firearm sales at gun shows within the State of Vermont. Parros has held an ATF Federal firearms license since September 1992. Parros holds no other ATF license and no instances were observed where additional ATF licenses would be required. Parros maintains a Type 3 Dealer in Firearms Special Occupational Tax (SOT) Stamp to transfer NFA items. This will be addressed again in **Section 9-NFA/Importer/Collector/Manufacturer** of this report.

According to the Town of Waterbury Assessor's Office website, the storefront is owned RP Henry Parro. A copy of the Property Card showing ownership is found as **Exhibit 1**. No formal lease agreement is in place between Henry Parro and Parros Gun Shop & Police Supplies Inc.

The business premises is located in a commercial area of Waterbury, Vermont. Parros Gun Shop & Police Supplies Inc. does not conduct any other business from the premises other than what was stated previously. Parros Gun Shop & Police Supplies Inc. is in compliance with State and local laws and does not utilize off-site storage.

Ownership and Control:

According to the State of Vermont Secretary of State website, Parros Gun Shop & Police Supplies Inc. is a domestic profit corporation, with a date of incorporation of April 30, 1992. In that document, Henry Parro is listed as President and (b)(6) as Secretary, see **Exhibit 2**. Henry Parro is listed as an RP on the ATF Federal firearms license, which is reflected correctly in Federal Licensing System (FLS) information. (b)(6) is the Son of Henry Parro. (b)(6) is a key employee at the licensed business, but is not an RP listed on the license. IOI (b)(6) explained to Henry Parro the advantages of adding (b)(6) on the license as an RP, even though Henry Parro made all the final business decisions. Henry Parro stated that he would consider adding (b)(6) to the license as an RP. IOI (b)(6) explained to Henry Parro the

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

procedure to add (b)(6) as an RP to the license. Henry Parro holds one hundred percent of the company stock. There have been no reported or unreported changes, and no hidden ownership is suspected or discovered during this inspection. One NCIC query were conducted on Henry Parro, which revealed no disqualifying convictions.

Variance:

No variances are in place at this time and none was requested during this inspection. IOI (b)(6) did not observe the need for a variance as a result of this inspection.

2 - Recommendation

Viols WL ONLY and No Recall Inspection

The recommendation is based on the inspection findings and current ATF Federal Firearms Administrative Action Policy and Procedures Order (ATF O 5370.1C). The results meet the threshold and warrant a Warning Letter due to three (3) violations.

1. The licensee failed to conduct a NICS check prior to the transfer of an NFA item. (b)(3)-112 Public Law 55-125 ATF Forms 4473, the licensee transferred NFA items to an RP of a trust without conducting a NICS check. The licensee was cited for this violation under 27 CFR 478.102(a).
2. The licensee failed to conduct a new NICS check after 30 days from the initial contact with NICS on (b)(3)-112 Public Law 55-125 ATF Form 4473. The licensee was cited for this violation under 27 CFR 478.102(c).
3. (b)(3)-112 Public Law 55-125 ATF missing firearms after reconciliation. The licensee was cited for this violation in the A&D record under 27 CFR 478.125(e).

FLS Information needs to be updated to reflect the complete middle name of Responsible Person Henry Parro to be Earl.

3 - Inspection History

IOI (b)(6) reviewed NSpect for previous inspections conducted. In one assignment conducted in 2000, a compliance inspection was assigned, but the recommendation is noted as "no"; in the other 2000 assignment, the type of assignment was unclear. Parros Gun Shop & Police Supplies Inc. was initially issued this license in September 1992.

Date of Inspection: 3/6/2000
Type of Inspection: Compliance

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

UI#: 762055-2000-0200

Inspection Results: No

Cited Violations: None

Date of Inspection: 6/21/2000

Type of Inspection:

UI#: 762055-2000-0325

Inspection Results: No further field action is necessary.

Cited Violations: None

Date of Inspection: 1/22/2009

Type of Inspection: Forward Trace

UI#: 762055-2009-0120

Inspection Results: Special request completed

Cited Violations: None

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

A full inventory was completed during the inspection, which included a comparison of all firearms in inventory to the A&D record. At the time of inspection, 1604 firearms were in physical inventory compared to (b)(3)-(7)(C) open entries in the A&D record. An actual discrepancy of (b)(3).

Of the (b)(3) discrepancies, (b)(3) open entries were determined to be where the licensee failed to record the disposition of a firearm. These discrepancies were reconciled by locating the ATF Form 4473 or commercial invoice for the disposition information. The licensee made corrections of these (b)(3) discrepancies to the A&D record immediately. The licensee was unable to locate disposition documentation pertaining to the remaining (b)(3) open entries. Because of the absence of a disposition record, these firearms were determined to be missing firearms; the licensee completed and submitted ATF Form 3310.11 Inventory Theft Loss Report during the inspection, see **Exhibit 3**.

Additionally, (b)(3)-(7)(C) acquisition dates were recorded incorrectly, (b)(3)-(7)(C) firearm serial numbers were recorded incorrectly and the acquisition of (b)(3)-(7)(C) firearms being received was recorded, when these firearms were never acquired. This error occurred when the licensee recorded the firearm information from an inaccurate invoice and never physically took possession of the firearm. This error was determined and reconciled by contacting the sender or distributor of the firearm.

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

The licensee was cited for a total of (b)(3) instances of this violation in the A&D record under **27 CFR 478.125(e)**; see **Report of Violations Reference Number 1** and **Worksheet 1**.

IOI (b)(6) found the licensee's standard operating procedures in regards to maintenance of the A&D record deficient. Parro stated that they try to record all entries in the A&D record for acquisitions and dispositions of firearms at the time when he takes possession or when the firearm is transferred, but sometimes it gets overlooked. Parros maintains the A&D record electronically. The electronic A&D record is in the proper format, all the headings of required information was accurate. Parros transitioned from paper bound books to electronic in October 2017. Parros transcribed all open entries in the paper bound books to the electronic A&D record at that time. Parro initially used "V6", an electronic A&D record software, but after a few months transitioned to a new electronic A&D record software "Access", which is currently what they are using.

According to the report obtained from the Violent Crime Analysis Branch (VCAB), the licensee reported (b)(3) theft and/or loss over the inspection period, which was recovered. There were (b)(3) traces completed by the licensee during the inspection period. The licensee had (b)(3) unresolved trace occur in 2004. IOI (b)(6) resolved this unsuccessful trace by contacting telephonically the Columbia, South Carolina Police Department, which initiated the trace. In that telephone call, it was determined by observing the serial number on the firearm, which was still in possession of the Police Department that the firearm serial number was either reported incorrectly or transcribed incorrectly. IOI (b)(6) contacted the ATF Tracing Center and advised the ATF Tracing Center of these findings. The ATF Tracing Center re-opened the trace with the firearm's correct serial number. No other unsuccessful traces occurred during the history of the license.

Firearms in inventory had proper markings, and there were no firearms with obliterated serial numbers. No illegal firearms were discovered.

Fifty (50) comparisons were made between the A&D record and completed ATF Forms 4473. No discrepancies were observed other than two inaccurate disposition dates and two incorrect serial numbers discovered during the inventory reconciliation stated previously, all were cited.

5 - ATF Forms 4473 – NICS & Other Dispositions

(b)(3) completed ATF Forms 4473 were on hand for the inspection period and all were reviewed. The licensee maintains completed forms in chronological order. The following errors were found on completed forms during inspection:

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

On (b)(3) 112 Public Law 55 125 STAT 552 forms, the licensee failed to furnish information on the ATF Form 4473 as indicated by the headings on the form and the instructions on or pertaining to the form. Errors included not recording the ethnicity in Box 10a on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording an answer or erroneously answering in Box 11a on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording or incorrectly recording the "type" of firearm transferred in Box 16 on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording a re-certification date in Box 23 on (b)(3) 112 Public Law 55 125 STAT 552 form; not recording or inaccurately recording the number of firearms transferred in Box 29 on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording the trade/corporate name and address of the transferor/seller in Box 33 on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording the transferor's/seller's printed name in Box 34 on (b)(3) 112 Public Law 55 125 STAT 552 forms and not recording the transferor's/seller's title in Box 36 on (b)(3) 112 Public Law 55 125 STAT 552 forms. There were (b)(3) 112 Public Law 55 125 STAT 552 ATF Forms 4473 contained multiple occurrences of this violation.

The licensee was cited for this violation under **27 CFR 478.21(a)**. See **Report of Violations Number 2** and **Worksheet 2**. **Exhibit 4** contains example copies of the completed ATF Forms 4473 where this violation occurred.

On (b)(3) 112 Public Law 55 125 STAT 552 forms, the licensee failed to obtain a properly completed ATF Form 4473 from the transferee. The errors included not recording the complete name of the transferee/buyer in Box 1 on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording the complete or accurate current address of the transferee/buyer in Box 2 on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording the complete/accurate weight in Box 5 on (b)(3) 112 Public Law 55 125 STAT 552 form; not recording an answer in Box 10b on (b)(3) 112 Public Law 55 125 STAT 552 form; not recording an answer in Box 11c on (b)(3) 112 Public Law 55 125 STAT 552 form; not recording an answer in Box 11d on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording an answer in Box 11i on (b)(3) 112 Public Law 55 125 STAT 552 form; not recording an answer in Box 12a on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording an answer in Box 12c on (b)(3) 112 Public Law 55 125 STAT 552 form; not recording an answer in Box 12.d.1 on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording the transferee's signature in Box 14 on (b)(3) 112 Public Law 55 125 STAT 552 form and not recording a certification date in Box 15 on (b)(3) 112 Public Law 55 125 STAT 552 forms. There were (b)(3) 112 Public Law 55 125 STAT 552 ATF Forms 4473 contained multiple occurrences of this violation.

The licensee was cited for this violation under **27 CFR 478.124(c)(1)**. See **Report of Violations Number 3** and **Worksheet 2**. **Exhibit 5** contains example copies of the completed ATF Forms 4473 where this violation occurred.

On (b)(3) 112 Public Law 55 125 STAT 552 forms, the licensee failed to verify/record on the ATF Form 4473 the complete identification document and/or alternate documentation presented to identify the transferee. The errors included the licensee not examining/recording the complete identification document information in Box 18a on (b)(3) 112 Public Law 55 125 STAT 552 forms and not examining/recording the correct alternate documentation needed to verify the residency of a transferee in Box 18b on (b)(3) 112 Public Law 55 125 STAT 552 forms.

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

The licensee was cited for this violation under **27 CFR 478.124(c)(3)(i)**. See **Report of Violations Number 4** and **Worksheet 2. Exhibit 6** contains examples copies of the completed ATF Forms 4473 where this violation occurred. All (b)(3) 112 Public Law 55 125 STAT 552 forms where the transferee did not record an answer to a prohibited question was run in NCIC, all came back negative.

On (b)(3) 112 Public Law 55 125 STAT 552 forms, the licensee failed to record on the ATF Form 4473 information pertaining to the NICS contact for a firearms transfer. Errors included the licensee failing to record the correct date in Box 19a in which NICS was contacted on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording an initial response from NICS in Box 19c on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording the delayed response provided by the NICS system in Box 19d on (b)(3) 112 Public Law 55 125 STAT 552 forms and not recording the response received by NICS after the firearm was transferred in Box 19e on (b)(3) 112 Public Law 55 125 STAT 552 form.

The licensee was cited for this violation under **27 CFR 478.124(c)(3)(iv)**. See **Report of Violations Number 5** and **Worksheet 2. Exhibit 7** contains examples copies of the completed ATF Forms 4473 where this violation occurred.

On (b)(3) 112 Public Law 55 125 STAT 552 forms, the licensee failed to record on the ATF Form 4473 information to identify the firearm to be transferred. Errors included not recording the Manufacturer/Importer in Box 24 on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording the model in Box 25 on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording the serial number in Box 26 on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording or inaccurately recording the type in Box 27 on (b)(3) 112 Public Law 55 125 STAT 552 forms and not recording the caliber/gauge in Box 28 on (b)(3) 112 Public Law 55 125 STAT 552 forms. There were (b)(3) 112 Public Law 55 125 STAT 552 ATF Forms 4473 contained multiple occurrences of this violation.

The licensee was cited for this violation under **27 CFR 478.124(c)(4)**. See **Report of Violations Number 6** and **Worksheet 2. Exhibit 8** contains examples copies of the completed ATF Form 4473 where this violation occurred.

On (b)(3) 112 Public Law 55 125 STAT 552 forms, the licensee failed to record on the ATF Form 4473 the transferor/seller signature and/or accurately date the form. The errors included not recording transferors/sellers signature in Box 35 on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording or recording an inaccurate transfer date in Box 37 on (b)(3) 112 Public Law 55 125 STAT 552 forms. There were (b)(3) 112 Public Law 55 125 STAT 552 ATF Forms 4473 contained multiple occurrences of this violation.

The licensee was cited for this violation under **27 CFR 478.124(c)(5)**. See **Report of Violations Number 7** and **Worksheet 2. Exhibit 9** contains examples copies of the completed ATF Form 4473 where this violation occurred.

On (b)(3) 112 Public Law 55 125 STAT 552 forms, the licensee failed to conduct a NICS check prior to the transfer of a firearm or NFA item. Errors included transferring NFA items to a Responsible Person of a trust without conducting a NICS check prior to transferring NFA items.

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

The licensee was cited for this violation under **27 CFR 478.102(a)**. See **Report of Violations Number 8** and **Worksheet 2**. **Exhibit 10** contains copies of the completed ATF Forms 4473 where this violation occurred. IOI (b)(6) ran both non-licensees in NCIC, both came back with negative results.

On (b)(3) 112 Public Law 552 form, the licensee failed to conduct a new NICS check after 30 days from the initial contact with NICS. The error occurred when the initial contact with NICS was a "delayed" response and then subsequently the firearm was transferred after 30 days, without conducting a new NICS check.

The licensee was cited for this violation under **27 CFR 478.102(c)**. See **Report of Violations Number 9** and **Worksheet 2**. **Exhibit 11** contains a copy of the completed ATF Form 4473 where this violation occurred. IOI (b)(6) ran the non-licensee in NCIC, which revealed no disqualifying convictions.

IOI (b)(6) found the licensee's standard operating procedures in regards to the review of the ATF Form 4473 deficient. At the closing conference of this inspection, Parro stated that the store had initiated a review process for completed forms to be conducted by a manger.

Transfers completed to/from other licensees are completed properly. The licensee retains copies of the Federal firearms license, which he transfers firearms to in a separate folder and was reviewed by IOI (b)(6) upon request. The licensee completed transfers to law enforcement officers over the inspection period using a departmental letterhead. All letters from Police Department and the Chief Law Enforcement Officer from that department was on file and was reviewed by IOI (b)(6) upon request. Five-hundred sixty one (561) comparisons were made between the NICS audit log and NICS generated transaction numbers (NTN) found on completed ATF Forms 4473; no discrepancies were observed.

6 - Multiple Sales

According to the Violent Crime Analysis Branch (VCAB) report, the licensee reported (b)(3) - 112 Public Law 55 125 Stat 552 multiple handgun sales involving (b)(3) - 112 Public Law 55 125 Stat 552 (b)(3) - 112 P handguns over the inspection period. During the onsite portion of the inspection, IOI (b)(6) discovered that the licensee had failed to complete and submit the ATF Form 3310.4 Report of Multiple Sale in (b)(3) 112 Public Law 552 instances for (b)(3) 112 Public Law 552 handguns. The licensee completed and submitted the form during the inspection.

The licensee was cited for this violation under **27 CFR 478.126a**; see **Report of Violations Reference Number 10** and **Worksheet 2**. **Exhibit 12** contains copies of completed ATF Form 4473 and Multiple Sale Form where this violation occurred.

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

7 - Suspicious/Prohibited Purchasers

To target potential traffickers, a FFL History Report was queried through VCAB and reviewed prior to conducting the inspection to detect multiple purchases of firearms by the same individual. IOI (b)(6) reviewed completed ATF Forms 4473 and the A&D record, for individuals purchasing quantities of firearms. These individuals were identified by observing the last name, as well as similar addresses. These firearms were run through eTrace to determine trace status. All queries revealed no suspicious or prohibited purchasers.

In each case, the licensee provided information relative to additional firearms transferred to those individuals, as well as firearms purchased by the store from those individuals. IOI (b)(6) completed a full analysis of these individuals in an attempt to identify firearms traffickers. Any firearm not appearing on the VCAB report as a multiple sale was run through eTrace, as well as the individuals' names. No further information was developed to warrant a referral being made, since no recent traces of firearms linked to these individuals were found or other suspected trafficking activities.

Twelve (12) completed ATF Forms 4473 within the inspection period where a denied response was received by NICS was compared to forms in the same general time for similar addresses or names for straw purchases. Additionally, a comparison was made by searching names and/or firearms in the A&D record. No "straw" purchases were identified.

8 - Trace Activity

(b)(3) - 112 Public Law 55 125 Stat 552 traces were completed to this licensee over the past year according to the FFL History obtained from VCAB. According to the report, (b)(3) - 112 Public Law 55 125 Stat 552 unsuccessful trace existed over the history of the license. IOI (b)(6) resolved this unsuccessful trace during the onsite portion of this inspection.

The licensee disposed of approximately (b)(4) used firearms over the inspection period. Of those used firearms transferred, approximately (b)(4) percent of those used firearms were transferred to other Federal firearms licensees. A secondary analysis was completed in eTrace on sixty-four (64) more commonly traced firearms such as (b)(3) - 112 Public Law 55 125 Stat 552, which were transferred to non-licensees, with no results.

There were four-hundred sixty (460) used firearms in inventory, of those used firearms in inventory over fifty percent are trade-ins from police departments and only sold to law enforcement. Of the remaining used firearms in inventory, forty-six (46) firearms were queried in NCIC, with no results.

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

9 - NFA/Importer/Collector/Manufacturer

Parros Gun Shop & Police Supplies Inc. maintains a Class 3 Special Occupational Tax (SOT) Stamp to deal in NFA items. Prior to the onsite portion of this inspection, IOI (b)(6) obtained a National Firearms Registry and Transfer Record (NFRTR, see Attachment) containing all NFA items registered to Parros Gun Shop & Police Supplies Inc. In comparing the NFRTR to the A&D record and physical inventory, one-hundred forty three (143) NFA items were in inventory (b)(3) - 26 USC 6103 items were listed on the NFRTR. The (b)(3) 112 Public Law NFA items that were not inventoried were determined to be new registrations and had not been shipped from the manufacturer as of yet. In the comparison of NFA items in inventory to the NFRTR no discrepancies were found. The majority of NFA items in inventory were suppressors.

Parros Gun Shop & Police Supplies Inc. does not import or manufacture firearms and is not a collector of firearms.

10 - Referrals

No referrals were generated as a result of this inspection.

11 - Other

This DE compliance inspection was assigned as a result of (b)(3) - 112 Public Law 55 125 Stat 552 (b)(6). IOI (b)(6) was able to complete the unresolved trace, which was an incorrect serial number entered into trace information. Parros Gun Shop & Police Supplies Inc. does transfer a large number (b)(4) of firearms, approximately (b)(4) percent of those are transferred to other Federal firearm licenses. IOI (b)(6) did not uncover any evidence to suspect trafficking activities.

Parros Gun Shop & Police Supplies Inc. also conducts gunsmithing services. IOI (b)(6) spoke with Paro about gunsmithing activities and of recordkeeping requirements pertaining to gunsmithing. There were twenty-seven (27) gunsmithing firearms in inventory at the time of this inspection, all were recorded in the Gunsmithing A&D record.

IOI (b)(6) found the licensee in compliance in regards to the Youth Handgun Safety Act (poster and notice) and having secure gun storage/safety devices available.

No other noteworthy findings were discovered.

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

12 - Closing Actions

On March 28, 2018, IOI (b)(6) conducted a closing conference with Parro. IOI (b)(6) discussed the results of the inspection and reviewed an ATF Form 5030.5, Report of Violations in detail, see **Exhibit 13** for a signed copy of this document; all possible corrective action had been taken by that time. IOI (b)(6) also discussed an Acknowledgement of Federal Firearms Regulations document with Parro; **Exhibit 14** contains a copy of the document signed by Parro. IOI (b)(6) provided Aiello with the following reference materials: Important ATF Phone Numbers and Addresses, FFL Quick Reference and Best Practices Guide and Safety and Security Information for Federal Firearms Licensees (ATF Publication 3317.2).

Parro attended a dealer seminar conducted by ATF in August 2016, which was held in Barre, Vermont.

13 - Violations

1. 27 CFR 478.125(e)

Nature of violation:

Failure of the licensee to timely record into the A&D record, the acquisition and/or disposition of firearms in the manner prescribed by regulation in (b)(3) 112 Public Law 55 125 STAT 552 instances. Errors included (b)(3) 112 Public Law 55 125 STAT 552 instances the licensee failed to record accurate information (serial number) obtained from the firearm; (b)(3) 112 Public Law 55 125 STAT 552 instances the licensee recorded the acquisitions of firearms, which had not been acquired (b)(3) 112 Public Law 55 125 STAT 552 instances the licensee failed to record accurate acquisition dates; (b)(3) 112 Public Law 55 125 STAT 552 instances, the licensee failed to record the disposition of a firearm transferred and (b)(3) 112 Public Law 55 125 STAT 552 instances, the licensee could not account for a missing firearm from inventory.

Licensee's response:

Parro stated that "they try to record all entries in the A&D record for acquisitions and dispositions of firearms at the time when I take possession or when the firearm is transferred, but it must have been overlooked".

Corrective Action:

The instances cited for in this inspection pertaining to the A&D record were corrected immediately. In the future, the licensee shall timely and accurately record the acquisition and disposition information of firearms in the manner prescribed by regulation.

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

For the (b)(3) 112 Public Law 55 125 S firearms that could not be accounted for from inventory, the licensee submitted ATF Form 3310.11-Inventory Theft loss Report, on February 23, 2018.

See **Report of Violations Reference Number 1, Worksheet 1 and Exhibit 3**

2. 27 CFR 478.21(a)

Nature of violation:

Failure of the licensee to furnish information on the ATF Form 4473 as indicated by the headings on the form and the instructions on or pertaining to the form on (b)(3) 112 Public Law 55 125 STAT 552 forms. Errors included not recording the ethnicity in Box 10a on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording an answer or erroneously answering in Box 11a on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording or incorrectly recording the "type" of firearm transferred in Box 16 on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording a re-certification date in Box 23 on (b)(3) 112 Public Law 55 125 STAT 552 form; not recording or inaccurately recording the number of firearms transferred in Box 29 on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording the trade/corporate name and address of the transferor/seller in Box 33 on (b)(3) 112 Public Law 55 125 STAT 552 forms; not recording the transferor's/seller's printed name in Box 34 on (b)(3) 112 Public Law 55 125 STAT 552 forms and not recording the transferor's/seller's title in Box 36 on (b)(3) 112 Public Law 55 125 STAT 552 forms. (b)(3) 112 Public Law 55 125 STAT 552 ATF Forms 4473 contained multiple occurrences of this violation.

Licensee's response:

Parro stated "that they try to do their best at reviewing forms, but these obviously didn't get reviewed well enough. Parro also stated "that since being inspected, a review process of all forms has been put into place".

Corrective Action:

No corrective action could be taken on the completed ATF Forms 4473 reviewed. In the future, the licensee shall ensure all required information is provided in accordance with the instructions and headings on or pertaining to the form.

See **Report of Violations Reference Number 2, Worksheet 2 and Exhibit 4**

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

3. 27 CFR 478.124(c)(1)

Nature of violation:

Failure of the licensee to obtain a properly completed ATF Form 4473 from the transferee on [REDACTED] forms. The errors included not recording the complete name of the transferee/buyer in Box 1 on [REDACTED] forms; not recording the complete or accurate current address of the transferee/buyer in Box 2 on [REDACTED] forms; not recording the complete/accurate weight in Box 5 on [REDACTED] form; not recording an answer in Box 10b on [REDACTED] form; not recording an answer in Box 11c on [REDACTED] form; not recording an answer in Box 11d on [REDACTED] forms; not recording an answer in Box 11i on [REDACTED] form; not recording an answer in Box 12a on [REDACTED] forms; not recording an answer in Box 12c on [REDACTED] form; not recording an answer in Box 12.d.1 on [REDACTED] forms; not recording the transferee's signature in Box 14 on [REDACTED] form and not recording a certification date in Box 15 on [REDACTED] forms. [REDACTED] ATF Forms 4473 contained multiple occurrences of this violation.

Licensee's response:

Parro stated "that I now understand that our review process was not enough, but has since initiated a review process with a manager reviewing all forms".

Corrective Action:

No corrective action could be taken on the completed ATF Forms 4473 reviewed. In the future, the licensee shall obtain a properly completed ATF Form 4473 from the transferee prior to transferring a firearm.

See **Report of Violations Reference Number 3, Worksheet 2 and Exhibit 5**

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

Nature of violation:

Failure of the licensee to verify the identity of the transferee by examining the identification document and/or alternate documentation presented and recording the complete type (issuing authority), identification number and expiration date on [REDACTED] forms. The errors included the licensee not examining/recording the complete identification document information in Box 18a on [REDACTED] forms and not examining/recording the correct alternate documentation needed to verify the residency of a transferee in Box 18b on [REDACTED] forms.

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

Licensee's response:

Parro stated "that I didn't know I could only take State college documentation as alternate documentation".

Corrective Action:

No corrective action could be taken on the completed ATF Forms 4473 reviewed. In the future, the licensee will verify the identity of the transferee and record the type of identification document, the identification document number and the complete expiration date of that identification document and/or alternate documentation.

See **Report of Violations Reference Number 4, Worksheet 2 and Exhibit 6**

5. **27 CFR 478.124(c)(3)(iv)**

Nature of violation:

Failure of the licensee to record on the ATF Form 4473 information pertaining to the NICS contact for a firearms transfer on [REDACTED] forms. Errors included the licensee failing to record the correct date in Box 19a in which NICS was contacted on [REDACTED] forms; not recording an initial response from NICS in Box 19c on [REDACTED] forms; not recording the delayed response provided by the NICS system in Box 19d on [REDACTED] forms and not recording the response received by NICS after the firearm was transferred in Box 19e on [REDACTED] form.

Licensee's response:

Parro stated that "this is all about review and the review process now in place will end these errors".

Corrective Action:

No corrective action could be taken on the completed ATF Forms 4473 reviewed. In the future, the licensee shall record all information pertaining to the NICS system required on the ATF Form 4473.

See **Report of Violations Reference Number 5, Worksheet 2 and Exhibit 7**

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

6. **27 CFR 478.124(c)(4)**

Nature of violation:

Failure of the licensee to record on the ATF Form 4473 information to identify the firearm to be transferred on (b)(3) 112 Public Law 55 125 517 forms. Errors included not recording the Manufacturer/Importer in Box 24 on (b)(3) 112 Public Law 55 125 517 forms; not recording the model in Box 25 on (b)(3) 112 Public Law 55 125 517 forms; not recording the serial number in Box 26 on (b)(3) 112 Public Law 55 125 517 forms; not recording or inaccurately recording the type in Box 27 on (b)(3) 112 Public Law 55 125 517 forms and not recording the caliber/gauge in Box 28 on (b)(3) 112 Public Law 55 125 517 forms. (b)(3) 112 Public Law 55 125 517 ATF Forms 4473 contained multiple occurrences of this violation.

Licensee's response:

Again Parro stated "the review process that is now in place should end these errors".

Corrective Action:

No corrective action could be taken on the completed ATF Forms 4473 reviewed. In the future, the licensee shall record all information required to identify the firearm on the ATF Form 4473.

See **Report of Violations Reference Number 6, Worksheet 2 and Exhibit 8**

7. **27 CFR 478.124(c)(5)**

Nature of violation:

Failure to have the transferor/seller sign and/or accurately date on (b)(3) 112 Public Law 55 125 517 ATF Forms 4473. The errors included not recording transferors/sellers signature in Box 35 on (b)(3) 112 Public Law 55 125 517 forms; not recording or recording an inaccurate transfer date in Box 37 on (b)(3) 112 Public Law 55 125 517 forms. (b)(3) 112 Public Law 55 125 517 ATF Forms 4473 contained multiple occurrences of this violation.

Licensee's response:

Parro stated "that I will be having a training session with all employees".

Corrective Action:

No corrective action could be taken on the completed ATF Forms 4473 reviewed. In the future, the licensee shall sign and/or accurately date the ATF Form 4473 if the

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

licensee does not know or have reasonable cause to believe that the transferee is disqualified by law from receiving the firearm.

See **Report of Violations Reference Number 7, Worksheet 2 and Exhibit 9**

8. **27 CFR 478.102(a)**

Nature of violation:

Failure of the licensee to conduct a NICS check prior to the transfer of a firearm or NFA item, if that person is a Responsible Person (RP) of a trust. Errors included transferring NFA items to an RP of a trust without conducting a NICS check on [REDACTED] forms.

Licensee's response:

Parro stated "that I understand the requirement and can't believe it was missed".

Corrective Action:

No corrective action could be taken on the completed ATF Forms 4473 reviewed. In the future, the licensee shall conduct a NICS check prior to the transfer of all firearms to non-licensees. IOI (b)(6) ran both non-licensees in NCIC, both came back negative.

See **Report of Violations Reference Number 8, Worksheet 2 and Exhibit 10**

9. **27 CFR 478.102(c)**

Nature of violation:

Failure of the licensee to conduct a new NICS check after 30 days from the initial contact with NICS on [REDACTED] form.

Licensee's response:

Parro stated "I understand the requirement".

Corrective Action:

No corrective action could be taken on the completed ATF Forms 4473 reviewed. In the future, the licensee shall initiate a new NICS check if the firearm is not transferred

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

after 30 days from the time the initial contact was made with NICS. IOI (b)(6) ran the non-licensee in NCIC, which revealed no disqualifying convictions.

See **Report of Violations Reference Number 9, Worksheet 2 and Exhibit 11**

10. **27 CFR 478.126a**

Nature of violation:

Failure of the licensee to complete and submit the ATF F 3310.4 Report of Multiple Sale of Pistols or Revolvers in (b)(6) occurrences.

Licensee's response:

Parro stated that "I can't see how we missed these multiple sales, we've been pretty good with all the others".

Corrective Action:

The licensee shall complete and submit a multiple handgun sale form (ATF F3310.4) by the close of business on the day of the transaction. (b)(6) ATF F 3310.4 were completed and submitted for the (b)(6) occurrences not reported on that was identified during the inspection.

See **Report of Violations Reference Number 10, Worksheet 2 and Exhibit 12**

X

Industry Operations Investigator

FIREARMS INSPECTION REPORT

Name: Parros Gun Shop & Police Supplies Inc.
Trade Name:

UI#: 762055-2018-0045-B1B
FFL#: 6-03-023-01-9K-33609

Index of Worksheets and Exhibits

WORKSHEETS

Information Page

Worksheet 1: Inventory and A&D Review

Worksheet 2: ATF F 4473 Review (2012 edition)

Worksheet 2: ATF F 4473 Review (2016 edition)

Statistical Page

EXHIBITS

Exhibit 1: Property Card showing licensed business premises property ownership

Exhibit 2: Business Inquiry with the VT SOS for Parros Gun Shop & Police Supplies Inc.

Exhibit 3: ATF Form 3310.11-Inventory Theft loss Report, submitted on February 23, 2018

Exhibit 4: Examples of the Forms 4473 where the licensee was cited under 27 CFR 478.21(a)

Exhibit 5: Examples of the Forms 4473 where the licensee was cited under 27 CFR
478.124(c)(1)

Exhibit 6: Examples of the Forms 4473 where the licensee was cited under 27 CFR
478.124(c)(3)(i)

Exhibit 7: Examples of the Forms 4473 where the licensee was cited under 27 CFR
478.124(c)(3)(iv)

Exhibit 8: Examples of the Forms 4473 where the licensee was cited under 27 CFR
478.124(c)(4)

Exhibit 9: Examples of the Forms 4473 where the licensee was cited under 27 CFR
478.124(c)(5)

Exhibit 10: Copy of the Form 4473 where the licensee was cited under 27 CFR 478.102(a)

Exhibit 11: Copies of the Forms 4473 where the licensee was cited under 27 CFR 478.102(c)

Exhibit 12: Copies of the Forms 4473 where the license was cited under 27 CFR 478.126a

Exhibit 13: Signed copy of ATF Form 5030.5, Report of Violations

Exhibit 14: Signed copy of the Acknowledgement of Federal Firearm Regulations document



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

www.atf.gov

762055: (b)(6)
5370

4/29/2018

WARNING LETTER

Parros Gun Shop & Police Supplies Inc.
95 US Route 2
Waterbury, Vermont 05676-9405

Re: Federal Firearms License Number: 6-03-023-01-9K-33609

Dear Mr. Henry Parro,

As a result of a recent compliance inspection conducted by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) at your firearms business located at 95 US Route 2, Waterbury, Vermont on February 12, 2018 through March 28, 2018, you were cited for violations of 27 Code of Federal Regulations, Part 478. The violations were discussed with you during the inspection. A copy of the Report of Violations, ATF Form 5030.5, issued at the time of the inspection is enclosed.

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

The records you are required to maintain and the business operations you conduct are important to law enforcement in our continuing efforts to reduce violent crime and protect the public. It is

Parros Gun Shop & Police Supplies Inc.
FFL# 6-03-023-01-9K-33609

essential that you comply with all Federal laws and regulations that govern your firearms business. ATF appreciates the efforts you and other industry members make in this area, and we look forward to continuing to work with you in that regard.

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

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

Sincerely,

(b)(6)

Area Supervisor
Hartford Area Office

cc: Federal Firearms Licensing Center
Hartford Area Office

Attachment

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 Parros Gun Shop & Police Supplies Inc.	Street Address 95 US Route 2	City Waterbury	State Vermont	ZIP Code 05676-9405	County Washington	Page 1 of 1 Pages
License/Permit/Registry Number (if any) 6-03-023-01-9K-33609		Expiration Date October 1, 2019	Date(s) or Period of Inspection February 12, 2017 - February 12, 2018			

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 478.125(e) ✓	Failure of the licensee to timely record into the A&D record, the acquisition and/or disposition of firearms in the manner prescribed by regulation in instances. Errors included instances the licensee failed to record accurate information (serial number) obtained from the firearm; instances the licensee recorded the acquisitions of firearms, which had not been acquired; instances the licensee failed to record accurate acquisition dates; instances, the licensee failed to record the disposition of a firearm transferred and instances, the licensee could not account for a missing firearm from inventory.	The licensee shall timely and accurately record the acquisition and disposition information of firearms in the manner prescribed by regulation.	Violation Corrected Immediately Licensee submitted ATF Form 3310.11-Inventory Theft loss Report, on February 23, 2018 for firearms that could not be accounted for from inventory.
2	27 CFR 478.21(a) ✓	Failure of the licensee to furnish information on the ATF Form 4473 as indicated by the headings on the form and the instructions on or pertaining to the form on forms. Errors included not recording the ethnicity in Box 10a on forms; not recording an answer or erroneously answering in Box 11a on forms; not recording or incorrectly recording the "type" of firearm transferred in Box 16 on forms; not recording a re-certification date in Box 23 on form; not recording or inaccurately recording the number of firearms transferred in Box 29 on forms; not recording the trade/corporate name and address of the transferor/seller in Box 33 on forms; not recording the transferor's/seller's printed name in Box 34 on forms and not recording the transferor's/seller's title in Box 36 on forms. ATF Forms 4473 contained multiple occurrences of this violation.	The licensee shall ensure all required information is provided in accordance with the instructions and headings on or pertaining to the form.	Unable to correct violation

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

Signature and Title of ATF Officer

IoT

(b)(6)

Date

3/28/18

Date

3/28/18

ATF E-Form 5030.5
Revised April 2005

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 Parros Gun Shop & Police Supplies Inc.	Street Address 95 US Route 2	City Waterbury	State Vermont	ZIP Code 05676-9405	County Washington	Page 2 of 1 Pages
License/Permit/Registry Number (if any) 6-03-023-01-9K-33609		Expiration Date October 1, 2019	Date(s) or Period of Inspection February 12, 2017 - February 12, 2018			

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)
3	27 CFR 478.124(c)(1) ✓	Failure of the licensee to obtain a properly completed ATF Form 4473 from the transferee on (b)(3) 112 Public Law 55 125 forms. The errors included not recording the complete name of the transferee/buyer in Box 1 on (b)(3) 112 Public forms; not recording the complete or accurate current address of the transferee/buyer in Box 2 on (b)(3) 112 Public forms; not recording the complete/accurate weight in Box 5 on (b)(3) 112 Public form; not recording an answer in Box 10b on (b)(3) 112 Public form; not recording an answer in Box 11c on (b)(3) 112 Public form; not recording an answer in Box 11d on (b)(3) 112 Public forms; not recording an answer in Box 11i on (b)(3) 112 Public form; not recording an answer in Box 12a on (b)(3) 112 Public forms; not recording an answer in Box 12c on (b)(3) 112 Public form; not recording an answer in Box 12.d.1 on (b)(3) 112 Public forms; not recording the transferee's signature in Box 14 on (b)(3) 112 Public form and not recording a certification date in Box 15 on (b)(3) 112 Public forms. ATF Forms 4473 contained multiple occurrences of this violation.	The licensee shall obtain a properly completed ATF Form 4473 from the transferee prior to transferring a firearm.	Unable to correct violation
4	27 CFR 478.124(c)(3)(i) ✓	Failure of the licensee to verify the identity of the transferee by examining the identification document and/or alternate documentation presented and recording the complete type (issuing authority), identification number and expiration date on (b)(3) 112 Public Law 55 125 forms. The errors included the licensee not examining/recording the complete identification document information in Box 18a on (b)(3) 112 Public forms and not examining/recording the correct alternate documentation needed to verify the residency of a transferee in Box 18b on (b)(3) 112 Public Law 55 125 STAT forms.	The licensee will verify the identity of the transferee and record the type of identification document, the identification document number and the complete expiration date of that identification document and/or alternate documentation.	Unable to correct violation

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 Parros Gun Shop & Police Supplies Inc.	Street Address 95 US Route 2	City Waterbury	State Vermont	ZIP Code 05676-9405	County Washington	Page <u>3</u> of <u>1</u> Pages
License/Permit/Registry Number (if any) 6-03-023-01-9K-33609		Expiration Date October 1, 2019	Date(s) or Period of Inspection February 12, 2017 - February 12, 2018			

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)
5	27 CFR 478.124(c)(3)(iv) ✓	Failure of the licensee to record on the ATF Form 4473 information pertaining to the NICS contact for a firearms transfer on (b)(3) 112 Public Law 55 125 forms. Errors included the licensee failing to record the correct date in Box 19a in which NICS was contacted on (b)(3) 112 Public Law 55 125 forms; not recording an initial response from NICS in Box 19c on (b)(3) 112 Public Law 55 125 forms; not recording the delayed response provided by the NICS system in Box 19d on (b)(3) 112 Public Law 55 125 forms and not recording the response received by NICS after the firearm was transferred in Box 19e on (b)(3) 112 Public Law 55 125 form.	The licensee shall record all information pertaining to the NICS system required on the ATF Form 4473.	Unable to correct violation
6	27 CFR 478.124(c)(4) ✓	Failure of the licensee to record on the ATF Form 4473 information to identify the firearm to be transferred on (b)(3) 112 Public Law 55 125 forms. Errors included not recording the Manufacturer/Importer in Box 24 on (b)(3) 112 Public Law 55 125 forms; not recording the model in Box 25 on (b)(3) 112 Public Law 55 125 forms; not recording the serial number in Box 26 on (b)(3) 112 Public Law 55 125 forms; not recording or inaccurately recording the type in Box 27 on (b)(3) 112 Public Law 55 125 forms and not recording the caliber/gauge in Box 28 on (b)(3) 112 Public Law 55 125 forms. ATF Forms 4473 contained multiple occurrences of this violation.	The licensee shall record all information required to identify the firearm on the ATF Form 4473.	Unable to correct violation
7	27 CFR 478.124(c)(5) ✓	Failure to have the transferor/seller sign and/or accurately date on (b)(3) 112 Public Law 55 125 ATF Forms 4473. The errors included not recording transferors/sellers signature in Box 35 on (b)(3) 112 Public Law 55 125 forms; not recording or recording an inaccurate transfer date in Box 37 on (b)(3) 112 Public Law 55 125 forms. ATF Forms 4473 contained multiple occurrences of this violation.	The licensee shall sign and/or accurately date the ATF Form 4473 if the licensee does not know or have reasonable cause to believe that the transferee is disqualified by law from receiving the firearm.	Unable to correct violation

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 Parros Gun Shop & Police Supplies Inc.	Street Address 95 US Route 2	City Waterbury	State Vermont	ZIP Code 05676-9405	County Washington	Page 4 of 1 Pages
License/Permit/Registry Number (if any) 6-03-023-01-9K-33609		Expiration Date October 1, 2019	Date(s) or Period of Inspection February 12, 2017 - February 12, 2018			

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)
8	27 CFR 478.102(a) ✓	Failure of the licensee to conduct a NICS check prior to the transfer of a firearm or NFA item, if that person is a Responsible Person (RP) of a trust. Errors included transferring NFA items to an RP of a trust without conducting a NICS check on (b)(3) 112 P.02 forms.	The licensee shall conduct a NICS check prior to the transfer of all firearms to non-licensees.	Unable to correct violation
9	27 CFR 478.102(c) ✓	Failure of the licensee to conduct a new NICS check after 30 days from the initial contact with NICS on (b)(3) 112 P.02 form.	The licensee shall initiate a new NICS check if the firearm is not transferred after 30 days from the time the initial contact was made with NICS.	Unable to correct violation
10	27 CFR 478.126a ✓	Failure of the licensee to complete and submit the ATF F 3310.4 Report of Multiple Sale of Pistols or Revolvers in (b)(3) 112 P.02 occurrences.	The licensee shall complete and submit a multiple handgun sale form (ATF F3310.4) by the close of business on the day of the transaction.	Two ATF F 3310.4 were completed and submitted by the licensee for the occurrences not reported on that were identified during the inspection.