Assignment and Report

1. OPERATING NAME AND ADD	RESS		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.)							
(INCLUDE ZIP CODE AND CO	784025-2018-0127-B1B									
Heague, John Battlefield Adventures	1	1IT/LICENSE NUMBER 4a. TARGET DATE 4b. TARGET HOU 77111019F38121								
2035 E. Thompson Blvd. Ventura,CA 93001, Ventu	ra		5. REQUESTED BY (SIGNATURE, TITLE AND DATE)							
6. ATF OFFICER(S) ASSIGNED (b)(6) Lead Inv	estigator									
7. ASSIGNED BY (SIGNATURE,										
	pervisor, 10/03/2017									
8. PURPOSE/SPECIAL INSTRU	CTIONS									
Please conduct a complian	ce inspection.									
9. INSPECTION RESULTS	CHECK IF NO VIOL	ATIONS, ADJUSTN	MENTS, ETC	10. TRA\	/EL EXPENSES (C	DPTIONAL)				
NO. OF VIOLATIONS					2111 - PER DIEM					
NO. OF TECS CHECKS	NO. OF TECS	HITS		2112 - P.C).A.					
NO. OF TAX	\$ VALUE OF T	AX INCREASES		2113 - CC	MM. AIR					
ADJUSTMENTS	\$ VALUE OF TA	AX DECREASES		2114 - RE	NTAL CAR					
NO. OF ASSESSMENTS	\$ VALUE OF A	SSESSMENTS		2115 - GF	PV EXPENSES					
NO. OF CLAIMS	\$ VALUE OF C			2116 - MI						
NO. OF TAX PERIODS		AXES VERIFIED			FOR INSP.					
Submitted on: 12/28/2017 Firearms Compliance Inspired Inspection findings are doc Recommend the email add	rumented in the narrat tress o <mark>(b)(6)</mark>	ive report. ROV		NLY and Recall						
Viols WL ONLY and Re	ecali inspection									
ATF OFFICER'S NAME (MONT	H YEAR HOURS)	12. TIME ACCO	UNTING DATA		⁄ 					
OCT 2017		<u>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>								
NOV 2017										
DEC 2017	4.00									
ATF OFFICER'S SUBTOTAL	41.00	ATF OFFICER'S	SIGNATURE							
TOTAL HOURS	41.00									
		13. REVIEW A	AND ROUTING							
REVIEW COMMENTS AND REC Viols WL ONLY and Rec										
VIOLS WE ONE! AND NO	oan mapeonon									
⊠ REVIE	:WED 🔀 CON	CUP TO	REE COMMENTS	SZ EINIAL DI	SBOSITION					
SIGNATURE AND TITLE	.vvLD CON		SEE COMMENTS	REVIEW DA						
(b)(6) - Area Superviso	r			1121240	12/28/20	17				

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Assignment and Report

OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY)	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 784025-2018-0127-B1B					
Heague, John Battlefield Adventures	3. PERMIT/LICENSE NUMBER 4a. TARGET DATE 4b. TARGET HOURS 977111019F38121					
2035 E. Thompson Blvd. Ventura,CA 93001, Ventura	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)					
ROUTING SEQUENCE AND DATE	•					
1						
	CONTROL FILE POSTED DATE					
3						

 Name:
 Heague, John
 UI#:
 784025-2018-0127-B1B

 Trade Name:
 Battlefield Adventures
 FFL#:
 9-77-111-01-9F-38121

Address: 2035 E. Thompson Blvd

Ventura, CA 93001 VENTURA

1 - Introduction

Inspection Profile:

On October 25, 2017, at approximately 11:00 a.m., Investigator (b)(6) conducted an unannounced full firearms compliance investigation incorporating the procedures and guidelines for a firearms investigation in the Industry Operations Manual. This investigation was conducted at John Heague d/b/a Battlefield Adventures. The inspection was conducted at the business premises located at 2035 E. Thompson Blvd, Ventura, CA 93001. John Heague, owner and responsible person was interviewed by Investigator Colon.

John Heague was identified through his California Driver's License number (b)(6), with a Date of Birth of (b)(6). De-confliction was conducted by Investigator Colon through the Firearms Licensing System with negative results. No other Federal, State, or local agencies were involved.

The period of review was from October 25, 2016 to October 25, 2017. There were (4) violations cited during this investigation.

Business Profile:

John Heague dba Battlefield Adventures maintains a Type 01 – Dealer in Firearms. Battlefield Adventures is actively engaged in the business of selling new and used handguns and long guns, as well as receivers. The licensee also conducts private party transactions, consignment sales and occasional out of state transactions through other licensed dealer. The licensee has many repeat customers. The licensee keeps a limited inventory of firearms, as the licensee also places firearms orders at the request of customers.

Battlefield Adventures also sells ammunitions, firearms accessories, old military surplus gears and equipment, fishing and hunting gears, as well as paintball equipment. The licensee has another FFL license #9-77-111-06-8A-03720 - Manufacturer of Ammunition for Firearms. A concurrent compliance inspection was conducted (see UI#784025-2018-0125-B1B). The licensee stated he has not conducted any business with the 06 License, as the city has denied him a local license as is prohibited in the zoning location. The licensee surrendered FFL licensee #9-77-111-06-8A-03720 to Investigator (b)(6). Battlefield Adventures acquired approximately (b)(4)

(b)(4)) firearms in the last twelve (12) months.

 Name:
 Heague, John
 UI#:
 784025-2018-0127-B1B

 Trade Name:
 Battlefield Adventures
 FFL#:
 9-77-111-01-9F-38121

The licensee has held the current Federal Firearms license since May of 1998. A Fictitious Business Name Statement search for Battlefield Adventures was conducted utilizing the Ventura County County Registrar-Recorder website, which indicated the name is active. Battlefield Adventures is in compliance with all the required State and local licenses (*Refer to Exhibit #1*):

- California Firearms Dealer License #20392
- Local Firearms License #0443572
- Seller's Permits SR AR 15769079
- California Certificate of Eligibility #10205
- Secondhand Dealer License #56081037

Ownership and Control:

Battlefield Adventures is a sole proprietorship owned by John Heague and listed as the only responsible person. The inspection did not disclose any hidden ownership. The responsible person information is correct as indicated by the FLS, however the email address should be corrected to reflect (b)(6), instead of (b)(6)

No other changes were needed.

Variance:

Battlefield Adventures has no variances on file with ATF, and did not request one during this investigation.

2 - Recommendation

Viols WL Only and Recall Inspection.

3 - Inspection History

The following inspection was conducted during the past five years.

Date of Inspection: November 2014

Type of Inspection: Compliance Inspection 784025-2014-0086-B1B

Inspection Results: No Viols, No Further Action, No Referrals

Cited Violations: None

Date of Inspection: April 2012

Type of Inspection: Recall Compliance Inspection 784025-2011-0017-B1B

Revised 7/1/15 Page 2 of 8

 Name:
 Heague, John
 UI#:
 784025-2018-0127-B1B

 Trade Name:
 Battlefield Adventures
 FFL#:
 9-77-111-01-9F-38121

Inspection Results: No Viols, No Further Action, No Referrals

Cited Violations: None

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

John Heague dba Battlefield Adventures uses manual Acquisition and Disposition (A&D) records. Battlefield Adventures has a total of seven (7) A&D bounds books, of which five are closed. The A&D records were found to be in the proper format required under ATF regulations. The A&D record had all of the required information in the entries. Investigator (b)(6) conducted a 100% inventory of all firearms and verified them by conducting a gun to book inventory method. There were open entries in the A&D record, however a comparison from the inventory to the A&D records revealed there were discrepancies noted. Battlefield Adventures had fifty-nine (59) firearms in physical inventory. A further review of the A&D records revealed disposition of firearms were not logged out after the transfers. The licensee was cited for the following:

• 27 CFR 478.125(e) – Failure to timely record the disposition of a firearm in instances. (See Worksheet 1)

No firearms with obliterated serial numbers were found in the inventory. No firearms were report stolen in the past 12 months. Investigator (b)(6) verified this information per the ATF Violent Crime Analysis Branch.

5 - ATF Forms 4473 - NICS & Other Dispositions

Battlefield Adventures filed the ATF Forms 4473s in chronological order. There were (b)(3) - 112 Public Law 55 125 Stat 552) ATF Form 4473s on file for this investigation period, in addition to denials/non-transfers. Investigator (b)(6) reviewed all forms, which revealed in (b)(3)-112 Public Law 55 125 Stat 552) instances, Section A, item 12.a were found not checked. The licensee was cited for the following:

• 27 CFR 478.124(c)(1) – Failure to obtain properly completed ATF Form 4473 instances; Section A, item 12.a, (2016 edition) found not checked (*Refer to Exhibit 2/Worksheet2*).

Investigator (b)(6) verified ATF Forms 4473s to the Acquisition and Disposition records, with no discrepancies disclosed.

DROS history report for the past twelve (12) months were requested for California Department of Justice. Investigator (b)(6) verified two hundred and five (205) DROS numbers to the ATF F 4473s. No discrepancies were noted.

 Name:
 Heague, John
 UI#:
 784025-2018-0127-B1B

 Trade Name:
 Battlefield Adventures
 FFL#:
 9-77-111-01-9F-38121

6 - Multiple Sales

- 27 CFR 478.126a Failure to report and file ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers, on (DIS)-112-PIODELEW SETESSEE (DISPOSITION OF PISTOLS AND DISPOSITION OF P
- 18 U.S.C. 923(g)(5)(A) Failure to report and file ATF Form 3310.12, Report of Multiple Sale or Other Disposition of Certain Rifles, or (INCOLUMN) instances.

Investigator (b)(6) verified the licensee prepared and submitted the ATF Forms 3310.4 and 3310.12 to ATF (Refer to Exhibit #4/Worksheet 2).

7 - Suspicious/Prohibited Purchasers

The ATF F 4473s were reviewed by purchaser's names and addresses to determine if the purchasers were potential traffickers or straw purchasers or may be engaging in the business without an FFL. The ATF Form 4473s were also reviewed for high crime firearms and weapons of choice. No prohibited or straw purchases were disclosed. No firearm trafficking information was disclosed during the review process. No persons that may possibly be dealing in firearms without a license were found.

8 - Trace Activity

A request to the Violent Crime Analysis Branch to provide FFL history queries for Battlefield Adventures was provided for the time period between October 16, 2015 to October 16, 2017. Battlefield Adventures was associated with firearms trace requests during that period. The trace requests were completed successfully.

9 - NFA/Importer/Collector/Manufacturer

The licensee does not engage in NFA firearms, import, collector or manufacturer activities.

10 - Referrals

Revised 7/1/15

 Name:
 Heague, John
 UI#:
 784025-2018-0127-B1B

 Trade Name:
 Battlefield Adventures
 FFL#:
 9-77-111-01-9F-38121

No referrals were generated during this investigation.

11 - Other

No other findings were disclosed during this investigation. A Federal Firearms Licensee Quick Reference and Best Practices Guide (ATF P 5300.15), ATF P 5310.2 pamphlet and the FFL Alert open letter were all provided. Additionally, ATF Publication 3317.7, Disaster Preparedness for Federal Firearms Licensees was also provided to the licensee.

12 - Closing Actions

On December 21, 2017, Investigator Colon held a closing conference with John Heague. Each applicable topic was discussed on the Acknowledgement of Federal Firearm Regulations. Emphasis was placed on the acquisition and disposition records, completion of ATF Forms 4473, identification documents, and multiple sales. John Heague signed and dated the Acknowledgement of Federal Regulations, and received a copy (*Refer to Exhibit #5*).

During the closing conference, the violations were reviewed and a signed copy of the Report of Violations (ATF F 5030.5) was obtained from John Heague (*Refer to Exhibit* #6).

13 - Violations

1. **18 U.S.C. 923(g)(5)(A)**

Nature of Violation:

The licensee failed to file and report ATF Form 3310.12, Report the Multiple Sales of Certain Rifles, on occasions involving firearms.

Licensee's response:

Regarding the issue, John Heague stated that the errors were an oversight as the business got busy at times, and his employees forgot to submit the forms. The licensee further stated he will ensure transactions will be thoroughly reviewed and ATF Form 3310.12 will be submitted on a timely manner.

Corrective action:

The licensee will immediately file ATF F 3310.12, Report of Multiple Sale or Other Disposition of Certain Rifles and submit to ATF.

Reference: Worksheet 2

Name: Heague, John UI#: 784025-2018-0127-B1B Trade Name: Battlefield Adventures FFL#: 9-77-111-01-9F-38121

2. **27 CFR 478.126a**

Nature of Violation:

The licensee failed to file and report ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers, on occasions involving firearms.

Licensee's response:

Regarding the issue, John Heague stated that the errors were an oversight as the business got busy at times, and his employees forgot to submit the forms. The licensee further stated he will ensure transactions will be thoroughly reviewed and ATF Form 3310.4 will be submitted on a timely manner.

Corrective action:

The licensee will prepare and submit ATF Forms 3310.4 to ATF immediately.

Reference: Worksheet 2

3. **27 CFR 478.124(c)(1)**

Nature of Violation:

The licensee failed to obtain properly completed ATF Form 4473 in instances; Section A, item 12.a., found not checked. (2016 Edition)

Licensee's response:

The licensee stated him and his staff overlooked the 4473's in questions and did not noticed the discrepancies. The licensee further stated he will ensure that all 4473s will be reviewed prior to the transferring of firearms.

Corrective action:

The licensee was informed all of Section A of the ATF Form 4473, must be completed personally by the transferee (buyer). The FFL was specifically advised that prior to making an transfer of a firearm to a non-licensee who is a resident of the state in which the licensee's business premises is located, the licensed dealer transferring the firearm shall be certain the buyer has completed all applicable items on ATF Form 4473.

Reference: Worksheet 2

4. **27 CFR 478.125(e)**

Nature of Violation:

The licensee failed to timely record the disposition of a firearm in instances. Disposition of firearms must be recorded not later then seven (7) days after the transfer.

Revised 7/1/15

 Name:
 Heague, John
 UI#:
 784025-2018-0127-B1B

 Trade Name:
 Battlefield Adventures
 FFL#:
 9-77-111-01-9F-38121

Licensee's response:

The licensee stated the business got busy and he forgot to ensure the firearms dispositions were entered into the A&D in a timely manner.

Corrective action:

The licensee was advised each licensed dealer shall enter into a record the disposition of firearms. The sale or other disposition of a firearm shall be recorded by the licensed dealer not later than (7) days following the date of such transaction. The record shall show the date of the sale or other disposition of each firearm, the name and address of the person to whom the firearm is transferred, or the name and license number of the person to whom transferred if such person is a licensee. The licensee corrected the dispositions dates for the dispositions in questioned.

Reference: Worksheet 2

5. 6.

X			

Industry Operations Investigator

Index of Worksheets and Exhibits

Worksheets

1. Firearms worksheets.

Exhibits:

- CFD/Local licenses.
- 2. Copies of 4473's.
- 3. Email from VCAB and Firearm Trace History.
- 4. Copies of Multiple Sale 3310.4/3310.12 and 4473's.
- 5. Acknowledgement of Federal Firearms Regulations.
- 6. Report of Violations signed by Owner/RP John Heague.
- 7. Warning Letter

Revised 7/1/15

Name: Heague, John UI#: 784025-2018-0127-B1B
Trade Name: Battlefield Adventures FFL#: 9-77-111-01-9F-38121

Revised 7/1/15

Page 8 of 8



Bureau of Alcohol, Tobacco, Firearms and Explosives

Bureau of ATF 550 N. Brand Bivd. #800 Glendale, CA 91203 www.atf.gov

Heague, John, dba Battlefield Adventures 2035 E. Thompson Blvd. Ventura, CA 93001

Dear Mr. Heague:

During a recent inspection at your firearms business covering the period 10/25/2016 to 10/25/2017 you were cited for violations of Title 27, Code of Federal Regulations, Part 478. A copy of the Report of Violations, ATF F 5030.5, issued at the time of the inspection is enclosed. All violations were fully explained to you by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Industry Operations Investigator. 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 conditioned upon your compliance with Federal laws and regulations. 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 (b)(6) Industry Operations Investigator at (b)(6)



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 Heague, John Battlefield Adventures	Street Address 2035 E. Thompson Bl	vd.	City Ventura		State CA	Zip Code 93001-	County Ventura	Page 1 of 3 Pages
				Date(s) or Period of Inspection 10/25/2016 through 10/25/2017				

Inspection Results

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

Number: 1

Nature of Violation:

The licensee failed to timely complete and submit the ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers, following the transfer of two or more handguns to a non-licensee within five consecutive business days. In the licensee failed to timely report the multiple handgun sale involving handguns.

Citation: 27 CFR 478.126a

Number: 2

Nature of Violation:

The licensee failed to timely complete and submit the ATF Form 3310.12, Report of Multiple Sale or Other Disposition of Certain Rifles, following the transfer of two or more rifles meeting the certain rifles criteria to a non-licensee within five consecutive business days. In (0/8)-112-2010 Law S 123 States instances, the licensee failed to timely report multiple rifle sales involving rifles.

Citation: 18 U.S.C. 923(g)(5)(A)

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

(If not corrected immediately)

Corrective Action to be Taken: The licensee will ensure that handgun transfers meeting the multiple sale criteria are properly documented and timely reported as required by Federal regulations. During the inspection, the licensee utilized disposition records to complete and submit the required ATF Report of Multiple Sale or Other Disposition of Pistols and Revolvers for the eighteen (18) transactions.

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

Corrective Action to be Taken: The licensee will ensure that rifles transfers meeting the multiple sale criteria are properly documentated and timely reported as required by Federal regulations. During the inspection, the licensee utilized disposition records to complete and submit the required ATF Report of Multiple Sale or Other Disposition of Certain Rifles for the (D)(3)-112 PUBLICATION transpetions.

For Official Use Only

ATF E-Form 5030-5

Report of Violations

Please write firmly with a ball point pen when c representative. The remaining copies will be sub		officers will prepare th						sponsible
Name of Proprietor Heague, John Battlefield Adventures Street Address 2035 E. Thompson Bittlefield Adventures		Ventura			State CA	Zip Code 93001-	County Ventura	Page 2 of 3 Pages
License/Permit/Registry Number (f any) 977111019F38121				Date(s) or Period of Inspection 10/25/2016 through 10/25/2017				
An examination of your premises, records and o	erations has disclosed th		tion Results which have been	explained	to you:			

Number: 3

Nature of Violation:

(b)(3) - 112 Public Law 55 125 Stat 5 The licensee failed to obtain properly completed ATF Fonn 4473 in Section A, item 12.a, found not checked,

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

(If not corrected immediately)

Corrective Action to be Taken: The licensee was informed all of Section A of the ATF Form 4473, must be completed personally by the transferee (buyer). The FFL was specifically advised that prior to making an transfer of a firearm to a non-licensee who is a resident of the state in which the licensee's business premises is located, the licensed dealer transferring the firearm shall be certain the buyer has completed all applicable items on ATF Form 4473.

Citation: 27 CFR 478.124(c)(1)

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 Street Address City State Zip Code County Page 3 of Heague, John 2035 E. Thompson Blvd. Ventura CA 93001-Ventura 3 Pages **Battlefield Adventures** License/Permit/Registry Number (If any) **Expiration Date** Date(s) or Period of Inspection. 977111019F38121 6/1/2019 10/25/2016 through 10/25/2017 Inspection Results An examination of your premises, records and operations has disclosed the following violations which have been explained to you: Number: 4 Date Corrections to be Made: (If not corrected immediately) Nature of Violation: Corrective Action to be Taken: The licensee was advised each licensed dealer shall enter The licensee failed to timely record the disposition of a firenin i (If not corrected immediately) into a record the disposition of firearms. The sale or other Disposition of firearms must be recorded in seven (7) days after the transfer. disposition of a firearm shall be recorded by the licensed dealer not later than (7) days following the date of such transaction. The record shall show the date of the sale or other disposition of each firearm, the name and address of the person to whom the firearm is transferred, or the name and license number of the person to whom transferred if such person is a licensee. The licensee corrected the dispositions dates for the dispositions in questioned. Citation: 27 CFR 478.125(e) I Have Received a Copy of This Report of Violations (Proprietor's signature and title) 0W21e/ Signature and Title of All Date Industry aperations Investigator For Official Use Only