

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Ray O'Herron Company Inc 3549 N Vermilion St Danville, IL 61834-1070, Vermilion	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 772060-2018-0067-B1B			
	<table border="1" style="width:100%; border-collapse: collapse;"><tr><td style="width:33%;">3. PERMIT/LICENSE NUMBER 337183018J04268</td><td style="width:33%;">4a. TARGET DATE 9/1/2018</td><td style="width:33%;">4b. TARGET HOURS</td></tr></table>	3. PERMIT/LICENSE NUMBER 337183018J04268	4a. TARGET DATE 9/1/2018	4b. TARGET HOURS
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	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)			

6. ATF OFFICER(S) ASSIGNED (b)(6) - Assigned Investigator (b)(6) - Assigned Investigator (b)(6) - Lead Investigator	
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7. ASSIGNED BY (SIGNATURE, TITLE AND DATE) (b)(6) Area Supervisor, 10/02/2017	
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8. PURPOSE/SPECIAL INSTRUCTIONS Please conduct a full scope recall inspection of this Type 01 FFL. During initial review of this assignment please ensure the shared drive is reviewed for any additional variance approvals, correspondences, etc. that are not located in the file. Zoning - Please utilize the Shared Zoning Folder for all zoning information. If a location needs added, deleted or amended/updated, please do so to ensure we maintain an accurate and up to date database.	
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9. INSPECTION RESULTS <table border="1" style="width:100%; border-collapse: collapse;"><tr><td style="width:25%;">NO. OF VIOLATIONS</td><td style="width:10%;">3</td><td style="width:25%;">NO. OF REFERRALS</td><td style="width:40%;"></td></tr><tr><td>NO. OF TECS CHECKS</td><td>9</td><td>NO. OF TECS HITS</td><td></td></tr><tr><td rowspan="2">NO. OF TAX ADJUSTMENTS</td><td rowspan="2"></td><td>\$ VALUE OF TAX INCREASES</td><td></td></tr><tr><td>\$ VALUE OF TAX DECREASES</td><td></td></tr><tr><td>NO. OF ASSESSMENTS</td><td></td><td>\$ VALUE OF ASSESSMENTS</td><td></td></tr><tr><td>NO. OF CLAIMS</td><td></td><td>\$ VALUE OF CLAIMS</td><td></td></tr><tr><td>NO. OF TAX PERIODS</td><td></td><td>\$ VALUE OF TAXES VERIFIED</td><td></td></tr></table>	NO. OF VIOLATIONS	3	NO. OF REFERRALS		NO. OF TECS CHECKS	9	NO. OF TECS HITS		NO. OF TAX ADJUSTMENTS		\$ VALUE OF TAX INCREASES		\$ VALUE OF TAX DECREASES		NO. OF ASSESSMENTS		\$ VALUE OF ASSESSMENTS		NO. OF CLAIMS		\$ VALUE OF CLAIMS		NO. OF TAX PERIODS		\$ VALUE OF TAXES VERIFIED		10. TRAVEL EXPENSES (OPTIONAL) <table border="1" style="width:100%; border-collapse: collapse;"><tr><td style="width:50%;">2111 - PER DIEM</td><td style="width:50%;"></td></tr><tr><td>2112 - P.O.A.</td><td></td></tr><tr><td>2113 - COMM. AIR</td><td></td></tr><tr><td>2114 - RENTAL CAR</td><td></td></tr><tr><td>2115 - GPV EXPENSES</td><td></td></tr><tr><td>2116 - MISC.</td><td></td></tr><tr><td>TOTAL \$ FOR INSP.</td><td></td></tr></table>	2111 - PER DIEM		2112 - P.O.A.		2113 - COMM. AIR		2114 - RENTAL CAR		2115 - GPV EXPENSES		2116 - MISC.		TOTAL \$ FOR INSP.	
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11. ATF OFFICER'S RECOMMENDATION Submitted by (b)(6) - Industry Operations Investigator Submitted on: 06/06/2018 A full field recall inspection was initiated on March 12-14, 2018 by IO Investigators (b)(3) 112 Public Law 55 125 STAT 552 (b)(6), (b)(6) at the licensed premises of Ray O'Herron Company Inc. President Michael O'Herron, Responsible Person Joshua Christensen, and Human Resources Manager (b)(6) were interviewed during the course of the inspection. Ray O'Herron Company Inc. holds a Type 01, dealer of firearms license. The inspection covered the period of March 12, 2017, through March 12, 2018. Three violations resulted from the inspection. A Warning Letter and Recall Inspection are recommended. Viols WL ONLY and Recall Inspection	
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12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)		
MAR 2018	27.00		
ATF OFFICER'S SUBTOTAL	27.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)		
MAR 2018	30.00		
APR 2018	16.00		
MAY 2018	17.00		
JUN 2018	8.00		
ATF OFFICER'S SUBTOTAL	71.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	98.00		

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Ray O'Herron Company Inc 3549 N Vermillion St Danville, IL 61834-1070, Vermillion	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 772060-2018-0067-B1B		
	3. PERMIT/LICENSE NUMBER 337183018J04268	4a. TARGET DATE 9/1/2018	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Warning Letter signed and mailed by A/S Pratt on 6/11/18.

Viols WL ONLY and Recall Inspection

☒ REVIEWED

☒ CONCUR

☒ SEE COMMENTS

☒ FINAL DISPOSITION

SIGNATURE AND TITLE

(b)(6) - Area Supervisor

REVIEW DATE

06/11/2018

ROUTING SEQUENCE AND DATE

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

CONTROL FILE POSTED DATE _____

FIREARMS INSPECTION REPORT

Name: Ray O'Herron Company Inc.

UI#: 772060-2018-0067-B1B

Trade Name:

FFL#: 3-37-183-01-8J-04268

Address: 3549 N Vermilion St.

Danville, IL 61834-1070 (Vermilion County)

1 - Introduction

Inspection Profile:

A full field recall inspection was initiated on March 12-14, 2018 by IO Investigators (b)(6) at the licensed premises of Ray O'Herron Company Inc. President Michael O'Herron, Responsible Person Joshua Christensen, and Human Resources Manager (b)(6) were interviewed during the course of the inspection. Ray O'Herron Company Inc. holds a Type 01, dealer of firearms license. The inspection covered the period of March 12, 2017, through March 12, 2018. No advance notice was provided to the licensee.

The initial onsite dates of the inspection are as follows:

- March 12, 2018 – Inventory was conducted and reconciliation was initiated.
- March 13, 2018 – Inventory reconciliation was continued and ATF Form 4473 review was conducted.
- March 14, 2018 – Inventory reconciliation with the licensee being provided a list of all discrepancies.

Subsequent visits were made on the following dates:

- April 9, 2018 – Verified disposition corrections in the bound book record
- May 3, 2018 – Verified acquisition corrections in the bound book record
- May 17, 2018 – Closing conference was held

Business Profile:

The licensee has held a Type 01 dealer of firearms license since the mid 1960's. The business is operated from a commercial storefront located in Danville, IL. No zoning restrictions apply to the location. During the noted 12 month inspection period, Ray O'Herron Company Inc. has acquired (b)(4) firearms and disposed of approximately (b)(4) firearms.

The ratio of new firearms versus used firearms in roughly (b)(4) new versus (b)(4) used. Approximately (b)(4) of firearms sold/transferred are handguns versus (b)(4) long guns. Around (b)(4) of the licensee's current inventory consisted of used firearms. Of these used firearms, (b)(4) were handguns while (b)(4) were long guns.

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The Federal firearms license of is primarily used for firearm sales/transfers to police departments and law enforcement officers. In addition to firearms sales, they also offer various law enforcement products such as clothing, holsters, ammunition, etc. Ray O'Herron Company, Inc. also maintains a separate licensed location in Downers Grove, IL (3-36-04346).

Gun shows are not attended as a licensed dealer; however, firearm repair is conducted. The licensee is properly enrolled in the Illinois State Police Firearm Transfer Inquiry Program and is properly registered with the Illinois Department of Revenue.

Ownership and Control:

Federal firearms license 3-37-183-01-8J-04268 is an active corporation that is properly licensed with the Illinois Secretary of State (See Exhibit #1). The Federal Licensing System (FLS) database lists Josh Christensen, Justin Fredericks, (b)(6), Michael O'Herron, and Raymond O'Herron as responsible persons for FFL #3-37-04268. It was disclosed during the course of the inspection that (b)(6) is no longer with the company and will be removed as a responsible person at the time of renewal. All noted responsible persons possess a valid IL FOID cards. No hidden ownership was disclosed. In addition, current listed responsible persons were queried in the Illinois LEADS database with no disabling information disclosed.

Variance:

Licensee maintains no variances and none were requested.

2 - Recommendation

A Warning Letter and Recall Inspection are recommended.

3 - Inspection History

The inspection history for Ray O'Herron Company Inc. is as follows.

Date of Inspection:	October 17, 2016
Type of Inspection:	Full Field Compliance
UI#:	772060-2016-0481-B1B
Inspection Results:	Warning Conference and Recall
Cited Violations:	1. 27 CFR 478.125(e) – (b)(6) instances in which licensee failed to maintain an accurate bound book record (REPEAT FROM MAY 1994 AND JUNE 2000 INSPECTIONS)

FIREARMS INSPECTION REPORT

Name: Ray O'Herron Company Inc.
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2. 27 CFR 478.102(c) – [REDACTED] instance in which licensee transferred a firearm on an expired approval number
3. 27 CFR 478.124(c)(3)(iv) – [REDACTED] instances in which ATF Form 4473 was incomplete/inaccurate ([REDACTED] with Question #21c blank, [REDACTED] with Question #21c inaccurate, [REDACTED] with Question #21d blank)
4. 27 CFR 478.21(a) – [REDACTED] instances in which Question #11a (actual buyer) on ATF Form 4473 contained an incorrect “no” answer
5. 27 CFR 478.124(c)(1) – [REDACTED] instances in which Question #11i (nonimmigrant alien) was blank
6. 27 CFR 478.126a – [REDACTED] instances in which licensee failed to report the multiple sale of handguns (REPEAT FROM MAY 1994 INSPECTION)
7. 27 CFR 478.124(b) – licensee failed to maintain ATF Forms 4473 in accordance with Federal regulations
8. 27 CFR 478.39a – [REDACTED] instance in which licensee failed to submit ATF Form 3310.11, FFL Firearms Inventory Theft/Loss Report

Date of Inspection: January 21, 2009
Type of Inspection: Special Request
UI#: 772060-2009-0110-B1B
Inspection Results: Special Request Completed/No Further Action
Cited Violations: No Violations

Date of Inspection: July 1, 2005
Type of Inspection: Compliance Inspection (Sample Only)
UI#: 772060-2005-0139-B1B
Inspection Results: No Further Action
Cited Violations: No Violations

Date of Inspection: June 21, 2000
Type of Inspection: Compliance Inspection
UI#: 772060-2000-0207
Inspection Results: Report of Violations Only
Cited Violations:

1. 27 CFR 479.101(c) – licensee failed to show proof of a registered machine gun
2. 27 CFR 479.131 – [REDACTED] instances in which machine gun acquisitions were not recorded
3. 27 CFR 478.125(e) – [REDACTED] instances in which firearm acquisitions or dispositions were not recorded (REPEAT FROM MAY 1994 INSPECTION)
4. 27 CFR 478.124(c) – [REDACTED] instance in which ATF Form

FIREARMS INSPECTION REPORT

Name: Ray O'Herron Company Inc.
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4473 was not completed properly (REPEAT FROM
MAY 1994 INSPECTION)

Date of Inspection: March 1994
Type of Inspection: Compliance Inspection
UI#: 35110941823FS
Inspection Results: Warning Conference
Cited Violations:

1. 27 CFR 478.125(e) – (b)(3) 112 P.0 instances in which firearm dispositions were not recorded, (b)(3) instances in which acquisitions were not recorded, and bound book failed to contain all required information
2. 27 CFR 478.50 – cited for off premises sale
3. 27 CFR 478.126a – (b)(3) instances in which licensee failed to report the multiple sale of handguns
4. 27 CFR 478.124(c) – (b)(3) instances in which ATF 4473 was inaccurately/incompletely executed

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

Ray O'Herron Company Inc. utilizes the EZ Arms Keeper software to maintain their acquisition and disposition record. At the onset of the inspection, a list of all of the licensee's open dispositions was requested. The open disposition list contained a total of (b)(3) 112 P.00 firearms. A full inventory of firearms was subsequently taken on March 12-13, 2018. After the inventory was completed, it was determined that Ray O'Herron Company Inc. had (b)(3) 112 P.00 firearms in inventory.

The review disclosed that (b)(3) 112 firearms in the physical inventory did not have a correlating entry in the bound book records. A total of (b)(3) 112 firearms on the open disposition list did not have a firearm in the physical inventory. As a result of the inspection, the following violation resulted from the inventory/bound book review.

On (b)(3) 112 instances, the licensee had inventory/acquisition and disposition record discrepancies which resulted in the violation of 27 CFR 478.125(e). These instances have been documented on Worksheet #1. Further details can be found in Section 13 – Violations, Violation #1.

5 - ATF Forms 4473 – NICS & Other Dispositions

Ray O'Herron Company Inc. had (b)(3) 112 forms on file for noted 12 month inspection period of March 12, 2017, through March 12, 2018. The forms are filed in chronological order further separated on a monthly basis. All forms for the inspection period were reviewed and 21 forms were traced back to the licensee's bound book. The ATF Form 4473 review disclosed the following discrepancies.

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On (b)(3) 112 instances, licensee was in violation of 27 CFR 478.21(a). These inaccuracies have been documented on Worksheet #2. Further details can be found in Section 13 – Violations, Violation #2. The firearm purchasers in these noted instances were run in the Illinois LEADS database and no disabling information was disclosed.

An Illinois State Police FTIP printout was requested for a 12 month period. The printout was verified against 32 ATF Forms 4473 for that period with no discrepancies resulting.

6 - Multiple Sales

The licensee's trace history and multiple sale record were obtained from the Violent Crime Analysis Branch (VCAB). The information received from VCAB revealed that the licensee was reporting multiple handgun sale transactions. However, a review of the licensee's ATF Forms 4473 disclosed (b)(3) 112 other instances in which a multiple sale report was warranted which resulted in the violation of 27 CFR 478.126a. These oversights have been documented on Worksheet #2. Further details can be found in Section 13 – Violations, Violation #3. The licensee was reminded that a multiple sale report must be completed when a firearm purchaser acquires two or more handguns within five business days.

7 - Suspicious/Prohibited Purchasers

Five firearm purchasers that failed to accurately complete ATF Form 4473, specifically for Question #11(a) were run through the Illinois LEADS database. In addition, Responsible Persons Josh Christensen, Justin Fredericks, Michael O'Herron, and Raymond O'Herron were also run through the Illinois LEADS database and queried in NSPECT. No prohibiting or disabling information was disclosed.

8 - Trace Activity

The information received from the e-trace database showed that Ray O'Herron Company Inc. (FFL# 3-37-04268) was associated with (b)(3) firearm trace requests, including (b)(3) duplicate, (b)(3) that were not completed an individual purchaser and (b)(3) that are pending completion (OPEN). (b)(3) 112 of the incomplete traces had a sales date of greater than 20 years while the other was not received by the licensee. (b)(3) 112 of the open traces was completed during the course of the inspection and the licensee did not receive the other. The information was forwarded to the National Tracing Center. In addition, the licensee had one FFL Theft report involving (b)(3) firearms, none of which have been recovered. These firearms were the result of the October 2016 compliance inspection.

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9 - NFA/Importer/Collector/Manufacturer

The Ray O'Herron Company Inc. does not import or manufacture firearms. In addition the licensee does not possess a collector's license. However, the licensee holds a valid Special Occupational Tax (SOT). At the onset of the inspection, the licensee had two NFA rifles in inventory for repair. During the closing conference, these NFA firearms had been returned to the police department from which they were obtained.

10 - Referrals

No referrals were generated as a result of the inspection.

11 - Other

No other noteworthy findings were disclosed.

12 - Closing Actions

A closing conference was conducted on May 17, 2018. A review of the inspection findings was discussed with President Michael O'Herron, Responsible Person Joshua Christensen, and Human Resources Manager (b)(6) and the discrepancies were documented on ATF Form 5030.5, Report of Violations. The three violations were thoroughly reviewed. Michael O'Herron signed ATF 5030.5 indicating that he has received a copy of the report.

All of the licensee's Federal regulatory responsibilities were stressed. An Acknowledgement of Federal Firearms Regulations was reviewed and signed by Michael O'Herron (See Exhibit #6). IOI (b)(6) verbalized the Acknowledgement's summary statement indicating that the licensee understood all of their requirements. Furthermore, Mr. O'Herron was instructed on how to obtain an electronic version of the regulations reference guide. Also, information regarding FFL Security and Private Sales was discussed the licensee with handouts for each being provided.

13 - Violations

1. 27 CFR 478.125(e) – THIS IS A REPEAT VIOLATION FROM THE OCTOBER 2016, JUNE 2000, AND MARCH 1994 COMPLIANCE INSPECTIONS

Nature of Violation: On (b)(3) 112 instances, licensee was in violation of 27 CFR 478.125(e) as follows. It was disclosed that (b)(3) firearms in the physical inventory did not have a correlating entry in the bound book records. A total of (b)(3) 112 firearms on the open disposition list did not have a firearm in the physical inventory. Out of the (b)(3) 112 firearms, it was determined that Ray O'Herron Company Inc. never received (b)(3) 112 of these firearms and made inaccurate acquisition entries. The noted firearms were sequential (b)(3) 112 pistols

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(b)(3) 112 Public Law 55 125 STAT 552). (b) (4) was contacted directly and said that those particular firearms were never shipped to Ray O'Herron Company Inc.

Licensee Response: The licensee understood and agreed with the noted violation. During the course of the closing conference, Ray O'Herron Company Inc. explained that it has implemented several new policies to rectify the inventory shortcomings. According to the licensee, each month an inventory of one particular firearm manufacturer will be conducted with a full inventory being conducted on a more regular basis.

The most prominent reason for the inaccuracies occurred as a result of the licensee transferring firearms to and from the Ray O'Herron location in Downers Grove with no correlating entries. A new procedure has been employed in which a mandatory e-mail is exchanged whenever any store to store transfer occurs.

Furthermore, the Ray O'Herron Company Inc. has a computerized system for all products in their store, including firearms, known as MASS. Now on a weekly basis, this system is reviewed for all firearm serial numbers and compared to the EZ Arms Keeper acquisition and disposition record to ensure that the primary record keeper, (b)(6), received all invoices needed.

Corrective Action: Return visits were made to Ray O'Herron Company Inc. on April 9, 2018 and May 3, 2018 to verify corrections. The (b)(3) firearms in inventory with no correlating bound book entry were properly entered into the EZ Arms Keeper system. An acquisition printout for each of the (b)(3) firearms was obtained to verify the corrections (See Exhibit #2).

Disposition documentation was obtained for the (b)(3) 112 open dispositions which had no firearm in inventory. It was determined that (b)(3) 112 firearms were transferred to the Ray O'Herron Company Inc. location in Downers Grove, IL. (b)(3) 112 firearms were transferred to other FFL's. A total of (b)(3) 112 firearms were law enforcement transfers. (b)(3) 112 firearms were determined to be sold on an ATF Form 4473. (b)(3) 112 firearm was reported missing as the result of the 2016 compliance inspection and never logged out of the records. Disposition documentation for the (b)(3) 112 noted firearms is attached (See Exhibit #3).

As noted, (b)(3) 112 (b)(3) 112 Public Law 55 125 STAT 552) pistols (b)(3) 112 Public Law 55 125 STAT 552) were inaccurately entered into the bound book record of Ray O'Herron Company Inc. After confirmation with (b) (4), the licensee amended the EZ Arms Keeper record to detail that the firearms were never received.

References: Worksheet #1, ROV Violation #1, Exhibits #2 & #3

FIREARMS INSPECTION REPORT

Name: Ray O'Herron Company Inc.
Trade Name:

UI#: 772060-2018-0067-B1B
FFL#: 3-37-183-01-8J-04268

2. 27 CFR 478.21(a) – THIS IS A REPEAT VIOLATION FROM THE OCTOBER 2016 COMPLIANCE INSPECTION

Nature of Violation: On [REDACTED] instances, licensee was in violation of 27 CFR 478.21(a). [REDACTED] ATF Form 4473's, Firearms Transaction Records, had an incorrect "no" answer for Questions #11(a) (actual buyer of the firearm listed on the form) (See Exhibit #4).

Licensee Response: The licensee understood and agreed with the noted violation. With regards to the ATF Form 4473 discrepancies, the licensee said that he had no excuse and just missed the errors. The licensee agreed that a more thorough review of completed ATF Forms 4473 was needed.

Corrective Action: The proper method for completing and obtaining an ATF Form 4473 was reviewed with the licensee. The firearm purchasers in these noted instances were run in the Illinois LEADS database and no disabling information was disclosed.

References: Worksheet #2, ROV Violation #2, Exhibit #4

3. 27 CFR 478.126a – THIS IS A REPEAT VIOLATION FROM THE OCTOBER 2016 AND MARCH 1994 COMPLIANCE INSPECTIONS

Nature of Violation: On [REDACTED] instances, licensee was in violation of 27 CFR 478.126a. Ray O'Herron Company Inc. failed to report two multiple handgun sales which involved [REDACTED] firearms.

Licensee Response: The licensee understood and agreed with the noted violation. As with the ATF Form 4473 discrepancies, the licensee said that the multiple sale oversight was just missed. Again, the licensee agreed that a more thorough review of completed ATF Forms 4473 was needed.

Corrective Action: Ray O'Herron Company Inc. completed ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers, and forwarded the forms appropriately (See Exhibit #5). The licensee was reminded that a multiple sale report must be completed when a firearm purchaser acquires two or more handguns within five business days.

References: Worksheet #2, ROV Violation #3, Exhibit #5

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Name: Ray O'Herron Company Inc.
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X

Industry Operations Investigator

Index of Worksheets and Exhibits

Worksheets 1 & 2

Exhibit #1 – Illinois Corporate Status

Exhibit #2 – Acquisition Documentation for A&D Corrections

Exhibit #3 – Disposition Documentation for A&D Corrections

Exhibit #4 – ATF Forms 4473 (Question #11a “no”)

Exhibit #5 – ATF Forms 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers

Exhibit #6 – Exhibit #12 – Acknowledgement of Federal Firearms Regulations dated 5/17/18

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U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

www.atf.gov

772060: (b)(6)
5370

June 11, 2018

WARNING LETTER

Ray O'Herron Company Inc.
ATTN: Michael O'Herron
3549 N Vermilion St.
Danville, IL 61834-1070

Re: Federal Firearms License Number: 3-37-183-01-8J-04268

Dear Mr. O'Herron:

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 3549 N Vermilion St.; Danville, IL 61834 on March 12-14, 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) (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

Ray O'Herron Company Inc.

Federal Firearms License Number: 3-37-183-01-8J-04268

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 was 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

cc: Federal Firearms Licensing Center
Springfield 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 Ray O'Herron Company Inc	Street Address 3549 N Vermilion St	City Danville	State IL	Zip Code 61834-1070	County Vermilion	Page 2 of 2 Pages
License/Permit/Registry Number (If any) 337183018J04268		Expiration Date 9/1/2018		Date(s) or Period of Inspection 03/12/2017 through 03/12/2018		

Inspection Results

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

Number: 2

Nature of Violation:

On ^{(b)(6)} instances, licensee was in violation of 27 CFR 478.21(a). ^{(b)(6)} ATF Form 4473's, Firearms Transaction Records, had an incorrect "no" answer for Questions #11(a) (actual buyer of the firearm listed on the form).

Citation: 27 CFR 478.21(a)

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

Corrective Action to be Taken: The proper method for completing and obtaining an ATF Form 4473 was reviewed with the licensee.
(If not corrected immediately)

Number: 3

Nature of Violation:

On ^{(b)(6)} instances, licensee was in violation of 27 CFR 478.126a. Ray O'Herron Company Inc. failed to report ^{(b)(6)} multiple handgun sales which involved ^{(b)(6)} firearms.

Citation: 27 CFR 478.126a

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

Corrective Action to be Taken: Ray O'Herron Company Inc. completed ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers, and forwarded the forms appropriately. The licensee was reminded that a multiple sale report must be completed when a firearm purchaser acquires two or more handguns within five business days.
(If not corrected immediately)

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

 President

Date
5/17/18

Signature and Title of ATF Officer

(b)(6) FOI

Date
5/17/18

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 Ray O'Herron Company Inc	Street Address 3549 N Vermilion St	City Danville	State IL	Zip Code 61834-1070	County Vermilion	Page 1 of 2 Pages
License/Permit/Registry Number (If any) 337183018J04268	Expiration Date 9/1/2018	Date(s) or Period of Inspection 03/12/2017 through 03/12/2018				

Inspection Results

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

Number: 1

Nature of Violation:

On (b)(3) 112 instances, licensee was in violation of 27 CFR 478.125(c) as follows. It was disclosed that (b)(3) firearms in the physical inventory did not have a correlating entry in the bound book records. A total of (b)(3) 112 firearms on the open disposition list did not have a firearm in the physical inventory. Out of the (b)(3) 112 firearms, it was determined that Ray O'Herron Company Inc. never received (b)(3) 112 of these firearms and made inaccurate acquisition entries. The noted firearms were sequential (b)(3) 112 pistols (b)(3) 112 Public Law 55 125 STAT 552 (b) (4) was contacted directly and said that those particular firearms were never shipped to Ray O'Herron Company Inc.

Citation: 27 CFR 478.125(c)

Date Corrections to be Made: 05/17/2018
(If not corrected immediately)

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

The (b)(3) firearms in inventory with no correlating bound book entry were properly entered into the EZ Arms Keeper system. An acquisition printout for each of the (b)(3) firearms was obtained to verify the corrections. Disposition documentation was obtained for the (b)(3) 112 open dispositions which had no firearm in inventory. It was determined that (b)(3) 112 firearms were transferred to the Ray O'Herron Company Inc. location in Downers Grove, IL. (b)(3) 112 firearms were transferred to other FFL's. A total of (b)(3) 112 firearms were law enforcement transfers. (b)(3) 112 firearms were determined to be sold on an ATF Form 4473. (b)(3) 112 firearm was reported missing as the result of the 2016 compliance inspection and never logged out of the records. The EZ Arms Keeper system was updated accordingly. As noted, (b)(3) 112 Glock pistols (b)(3) 112 Public Law 55 125 STAT 552 were inaccurately entered into the bound book record of Ray O'Herron Company Inc. After confirmation with (b) (4) the licensee amended the EZ Arms Keeper record to detail that the firearms were never received.