

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) I Deal Brokerage, Inc. I Deal Jewelry & Pawn 73 Gwinnett Drive Lawrenceville, GA 30046, Gwinnett	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 760530-2015-0132-B1B		
	3. PERMIT/LICENSE NUMBER 158135026C08835	4a. TARGET DATE 3/27/2015	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

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

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
(b)(6) Area Supervisor, 02/27/2015

8. PURPOSE/SPECIAL INSTRUCTIONS
The inspection should be conducted in accordance with the "Firearms Disposition Emphasis Inspection Quick Reference Guide." No inspection since FFL issued. Also, see the Memorandum Record of Conversation from Acting Area Supervisor (b)(6) and other attachments to be considered during the inspection.

9. INSPECTION RESULTS <input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC				10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	7	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS		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: 06/03/2015

Viols DIO (or Delegate) Held WC ILO Revocation

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)			
MAR 0	42.50		
APR 0	13.50		
MAY 0	2.00		
JUN 0	14.00		
JUL 0	4.00		
ATF OFFICER'S SUBTOTAL	76.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	76.00		

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	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Recommendation: Violations DIO (or Delegate) Held WC ILO Revocation.

Justification - According to the Administrative Action Chart, transferring a firearm to a prohibited person knowing or having reason to believe that the transferee is a prohibited person, might be considered justification for revocation of the Federal Firearms License. I Deal Jewelry and Pawn's employee released a rifle to a pawn customer, (b)(3) - 112 Public Law 55 125 Stat 552, after the customer answered in certification question 11c that he had been convicted of a felony. This licensee has held this FFL for approximately two years. During the past twelve months, the FFL has transferred firearms on ATF Forms 4473. Only one firearm transfer was to a prohibited person who was redeeming a rifle from pawn and presented a Georgia Carry Permit in lieu of going through a NICS check. In the area where this licensee is located, the local law enforcement office conducts background checks on individuals pawning firearms. It was during one of the local law enforcement office's routine background checks when it was discovered that (b)(6) is a prohibited person. Currently, there is a local case being worked on (b)(6) as a prohibited person in possession of a firearm. Since this is the first compliance inspection conducted on this licensee and the prohibited person is no longer in possession of the firearm, Therefore, It is recommended that the licensee be required to attend a warning conference with the Director of Industry Operations in lieu of revocation of license

Viols DIO (or Delegate) Held WC ILO Revocation

☒ REVIEWED ☒ CONCUR ☒ SEE COMMENTS ☐ FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6) - Area Supervisor	REVIEW DATE 05/06/2015
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REVIEW COMMENTS AND RECOMMENDATION

Recommendation: Violations DIO (or Delegate) Held WC ILO Revocation.

Justification - According to the Administrative Action Chart, transferring a firearm to a prohibited person knowing or having reason to believe that the transferee is a prohibited person, might be considered justification for revocation of the Federal Firearms License. I Deal Jewelry and Pawn's employee released a rifle to a pawn customer, (b)(3) - 112 Public Law 55 125 Stat 552, the customer answered in certification question 11c that he had been convicted of a felony. This licensee has held this FFL for approximately two years. During the past twelve months, the FFL has transferred firearms on ATF Forms 4473. Only one firearm transfer was to a prohibited person who was redeeming a rifle from pawn and presented a Georgia Carry Permit in lieu of going through a NICS check. In the area where this licensee is located, the local law enforcement office conducts background checks on individuals pawning firearms. It was during one of the local law enforcement office's routine background checks when it was discovered that (b)(6) is a prohibited person. Currently, there is a local case being worked on (b)(6) as a prohibited person in possession of a firearm. Since this is the first compliance inspection conducted on this licensee and the prohibited person is no longer in possession of the firearm, Therefore, It is recommended that the licensee be required to attend a warning conference with the Director of Industry Operations in lieu of revocation of license

Viols DIO (or Delegate) Held WC ILO Revocation

☒ REVIEWED ☒ CONCUR ☒ SEE COMMENTS ☒ FINAL DISPOSITION

SIGNATURE AND TITLE DDMITCHEL2 - Director, Industry Operations	REVIEW DATE 06/01/2015
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ROUTING SEQUENCE AND DATE

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

CONTROL FILE POSTED DATE _____

Report of Violations

Instructions

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

Name of Proprietor I Deal Brokerage, Inc. I Deal Jewelry & Pawn	Street Address 73 Gwinnett Drive	City Lawrenceville	State GA	Zip Code 30046-	County Gwinnett	Page 1 of 4 Pages
License/Permit/Registry Number <i>(If any)</i> 158135026C08835	Expiration Date 3/1/2016	Date(s) or Period of Inspection 03/24/2015 through 03/30/2015				

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:

Failure to provide the total number of firearms transferred, whether any part of the transaction was a pawn redemption, the name, address, and FFL number of the transferor, and the transferor's name and title in items 30a&b - 33, and 35 on (b)(3) - ATF Forms 4473. (b)(3) - 112

(b)(3) - 112 Public Law 55 125 Stat

Citation: 27 CFR 478.21(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee completed the missing information based on information recorded in the computerized records. Completed information was dated and initialed by the manager.

Number: 2

Nature of Violation:

On (b)(3) - Form 4473, the transferee failed to sign and date the certification in Section A and on an (b)(3) - 112 Public L Form 4473 the transferee failed to date the certification. (b)(3) - 112 Public Law 55 125 Stat 552

(b)(3) -

Citation: 27 CFR 478.124(c)(1)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Report of Violations

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Name of Proprietor I Deal Brokerage, Inc. I Deal Jewelry & Pawn	Street Address 73 Gwinnett Drive	City Lawrenceville	State GA	Zip Code 30046-	County Gwinnett	Page 2 of 4 Pages
License/Permit/Registry Number <i>(If any)</i> 158135026C08835	Expiration Date 3/1/2016	Date(s) or Period of Inspection 03/24/2015 through 03/30/2015				

Inspection Results

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

Number: 3

Nature of Violation:

Failure to obtain sufficient identification to verify the transferee's identity and residence address on (b)(3) transaction. (b)(3) - 112 Public Law 55 125 Stat 552

Citation: 27 CFR 478.124(c)(3)(i)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

In the future, ensure that the GA Carry Permit has a photograph of the transferee and a current residence address when using this document as identification to verify the transferee.

Number: 4

Nature of Violation:

Failure to complete the description of the firearm being transferred in items 26-30 of Section D on (b)(3) Form 4473. (b)(3) - 112 Public Law 55 125 Stat 552

Citation: 27 CFR 478.124(c)(4)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Manager Cooper completed the form from information found in the computerized record of this transaction.

Report of Violations

Instructions

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Name of Proprietor I Deal Brokerage, Inc. I Deal Jewelry & Pawn	Street Address 73 Gwinnett Drive	City Lawrenceville	State GA	Zip Code 30046-	County Gwinnett	Page 3 of 4 Pages
License/Permit/Registry Number <i>(If any)</i> 158135026C08835	Expiration Date 3/1/2016	Date(s) or Period of Inspection 03/24/2015 through 03/30/2015				

Inspection Results

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

Number: 5

Nature of Violation:

Failure to sign and date the Transferor's Certification in items 34 and 36 in Section D on (b)(3)-
Form 4473 and failure to date item 36 on (b)(3)- Form 4473. ((b)(3) - 112 Public Law 55 125 Stat 552
(b)(3)-

Citation: 27 CFR 478.124(c)(5)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee completed the missing information based on
information recorded in the computerized records.
Completed information was dated and initialed by the
manager.

Number: 6

Nature of Violation:

Failure to stop the transfer of (b)(3) firearm when the licensee has reason to believe the transferee is
a prohibited person when the transferee answered he had been convicted of a felony (b)(3) - 112 Pub
(b)(3) - 112 Public Law

Citation: 27 CFR 478.99(c)(1)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Report of Violations

Instructions

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

Name of Proprietor I Deal Brokerage, Inc. I Deal Jewelry & Pawn	Street Address 73 Gwinnett Drive	City Lawrenceville	State GA	Zip Code 30046-	County Gwinnett	Page 4 of 4 Pages
License/Permit/Registry Number (If any) 158135026C08835	Expiration Date 3/1/2016	Date(s) or Period of Inspection 03/24/2015 through 03/30/2015				

Inspection Results

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

Number: 7

Nature of Violation:

Failure to record the disposition of (b)(3) firearms transferred to other FFLs, (b)(3) firearm transferred to an individual on each of (b)(3) Forms 4473 (b)(3) - 112 Public Law 55 125 Stat 552 and (b)(3) firearm transferred to (b)(3) - 112 Public Law 55 125 Stat 552 in the A&D record.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Transfers for 48 firearms transferred to other FFLs were documented by a sales receipt and on file with the completed ATF Forms 4473 but the disposition information was not shown in the A&D log. Manager Cooper found an additional step that needed to be completed in the computer for this type transaction in order for the disposition information to show up in the disposition record and corrected this error by completing the step on each transaction. The (b)(3) - 112 unrecorded ATF Forms 4473 (b)(3) - 112 should be posted as dispositions in the computerized records.

Citation: 27 CFR 478.125(e)

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

(b)(6)

Date 3/31/15
Date 3/31/2015

FIREARMS INSPECTION REPORT

Name: I Deal Brokerage, Inc.
Trade Name: I Deal Jewelry & Pawn

UI#: 760530-2015-0132-B1B
FFL#: 1-58-135-02-6C-08835

Address: 73 Gwinnett Drive
Lawrenceville, GA 30046

1 - Introduction

Inspection Profile:

On March 24-25, 2015, Industry Operations Investigators (IOI) (b)(6) conducted a Firearms Disposition Emphasis compliance inspection and special instructions as noted on ATF EF 5700.14. Mr. Stravos (Steven) Papathanasiou, owner was notified by Store Manager James A. (Tony) Cooper upon IOI (b)(6) arrival that a compliance inspection would be conducted. Manager Cooper was available during the inspection. The closing conference was held on March 31, 2015 with Mr. Papathanasiou at his Norcross, Georgia pawnshop. The inspection covered the period March 24, 2014 through March 23, 2015.

A query of the Federal Licensing System (FLS) disclosed no Special Attention Flags (SAF) or ATF investigations. IOI (b)(6) conducted a NCIC check on Stavros M. Papathanasious on April 2, 2015 resulting in no prohibiting factors.

Business Profile:

The licensed premises are in a commercially zoned area in Lawrenceville, Georgia. During the past 12 months, the licensee acquired (b)(4) firearms. They disposed of (b)(4) firearms. All of the firearms in inventory are pawned firearms. The suppliers during this period were individuals. I Deal Jewelry & Pawn accepts firearms on pawn and facilitates internet firearms transactions. Any firearms not picked up out of pawn are offered for sale over the internet. The licensee does not purchase new firearms for retail sale or participate in gunshows. The business operates online at Gunbroker.com and www.IdealJewelryAndPawn.com. The LLC has held this Federal Firearms License (FFL) 1-58-135-02-08835 since February 7, 2013. Mr. Papathanasiou is also the sole responsible person on two additional FFLs: 1-58-135-02-6D-08833, I Deal Pawn & Cycle, LLC, d/b/a I Deal Pawn & Cycle, Snellville, Georgia and 1-58-121-02-6C-08834, I Deal Jewelry & Pawn, Inc., d/b/a I Deal Jewelry & Pawn Norcross, Georgia. According to the website, I Deal Jewelry & Pawn also operates as a pawn shop at 3593 Northcrest Road, Doraville, Georgia. Information on file in the Federal Licensing System (FLS) shows 3008 Roswell, LLC, d/b/a I Deal Jewlery & Pawn holds FFL 1-58-089-02-5M-08584 with licensed premises at 3593 Northcrest Road, Doraville, Georgia. Mr. Papathanasiou is not shown as a responsible person on the Doraville license. Alan Zager is shown as the sole owner for the Doraville license. I Deal Brokerage, Inc. has a business license with the City of Lawrenceville. The licensee utilizes no off-site storage.

FIREARMS INSPECTION REPORT

Name: I Deal Brokerage, Inc.
Trade Name: I Deal Jewelry & Pawn

UI#: 760530-2015-0132-B1B
FFL#: 1-58-135-02-6C-08835

Ownership and Control:

Stravos (Steve) Papathanasiou is the sole officer of I Deal Brokerage, Inc. He confirmed that he is the sole officer and director and responsible person on the license and that there have been no changes to the business structure since this license was issued. FLS accurately reflects this information.

Variance:

The licensee does not have any approved variances and Mr. Papathanasiou did not request any during this inspection. The licensee uses computerized records.

2 - Recommendation

Warning Conference with DIO in lieu of Revocation

3 - Inspection History

This is the first firearms compliance inspection held with the licensee.

Date and Type of Inspection: 02/07/2013 Firearms Qualification Inspection
UI#: 760530-2013-0124-B1B
Inspection Results: 1-58-135-02-PA-08835 issued
Cited Violations: None

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

The licensee maintains computerized A&D records. The FFL had never printed an A&D record for this license before the commencement of this inspection. The A&D record shows (b)(3) open entries; however, there were 24 firearms in physical inventory on March 25, 2015 for a difference of (b)(3) - 112 Public Law 55 125 firearms were transferred to other FFLs but were not showing as dispositions in the A&D record. **Exhibit B p1-148.** (b)(3) - 112 Public Law 55 125 firearms were transferred on ATF Forms 4473 dated (b)(3) - 112 Public Law 55 125 Stat 552 but were not showing as dispositions on the A&D record. **Exhibit B p1-4, 16-19 and Exhibit A p17-23.** The licensee was cited in violation of 27 CFR 478.125(e) for failure to record the disposition of (b)(3) firearms. **Reference Worksheet 1, Exhibit B, Exhibit A p17-23 and ROV 7.**

There were no theft/loss reports submitted by the licensee during this inspection period. The A&D record was printed in the proper format. There were (b)(3) - 11 firearms on ATF Forms 4473 on file that were traced to the disposition information in the A&D record. (b)(3) - 112 Public Law 55 125 of the (b)(3) - 11 firearms were not recorded as dispositions in the A&D record. There were (b)(3) firearms on sales receipts transferring the firearm to another FFL. The disposition information for the (b)(3) firearms was not shown in the A&D

FIREARMS INSPECTION REPORT

Name: I Deal Brokerage, Inc.
Trade Name: I Deal Jewelry & Pawn

UI#: 760530-2015-0132-B1B
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record due to employees leaving out a step when they transferred a firearms to another FFL. This error was identified and corrected during the inspection. IOI (b)(6) identified no trafficking, obliterated serial numbers, or illegal firearms. All employees are trained on how to accurately complete a firearm sale or redemption.

5 - ATF Forms 4473 – NICS & Other Dispositions

There are (b)(3) ATF Forms 4473 on file for transfers of firearms for the past twelve months. IOI (b)(6) reviewed all forms. On (b)(3) - 11 form, the licensee failed to provide information required in items 30 a&b – 33, and 35 in violation of 27 CFR 478.21(a). **Reference Worksheet 2, Exhibit A p 10-12, and ROV 1.** On (b)(3) - 11 Form 4473, the transferee failed to sign and date the certification in Section A and on an additional Form 4473, the transferee failed to date the certification in item 17 in violation of 27 CFR 478.124(c)(1). **Reference Worksheet 2, Exhibit A p 4-9, and ROV 2.** The licensee failed to obtain sufficient identification to verify the transferee's identity and residence address on (b)(3) - 11 form in violation of 27 CFR 478.124(c)(3)(i). **Reference Worksheet 2, Exhibit A p 13-16, and ROV 3.** On (b)(3) - 11 form, the licensee failed to complete the description of the firearm being transferred in items 26-30 of Section D in violation of 27 CFR 478.124(c)(4). **Reference Worksheet 2, Exhibit A p 10-12, and ROV 4.** On (b)(3) - 11 form, the licensee failed to sign and date the Transferor's Certification in items 34 and 36, and on (b)(3) - 11 form, he failed to date item 36 in violation of 27 CFR 478.124(c)(5). **Reference Worksheet 2, Exhibit A p 1-3 and 10-12, and ROV 5.** The licensee was cited in violation of 27 CFR 478.99(c)(1) when the licensee failed to stop the transfer of a firearm when the licensee had reason to believe the transferee is a prohibited person when the transferee answered he had been convicted of a felony. **Reference Worksheet 2, Exhibit A p 17 - 23, and ROV 6.** IOI Forrester received information in the form of a referral from ATF TFO (b)(6) (b)(6) and the Lawrenceville Police Department (LPD) concerning this transaction. Pawnbrokers in Lawrenceville provide information on all items pawned and the person pawning the items on a daily basis. LPD discovered that (b)(3) - 112 Public Law 55 125 Stat 552 (b)(3) - 112 Public Law 55 125 Stat 552 at this I Deal Jewelry & Pawn location and records show that (b)(6) is a prohibited person. At the time the firearm was redeemed by (b)(3) - 112 Public Law 55 125 Stat 552, he was still in possession of a Georgia Firearms Carry License but he did answer on the Form 4473 that he had been convicted of a felony.

The FFL audit log showed two denied transactions for the period of November 30, 1998 to March 23, 2015; and 13 proceed, no delayed, no open, and no cancelled or non-denied under appeal transactions for the period January 22, 2015 to March 23, 2015. All fifteen transactions were verified with ATF Forms 4473 on file.

6 – Multiple Sales

FIREARMS INSPECTION REPORT

Name: I Deal Brokerage, Inc.
Trade Name: I Deal Jewelry & Pawn

UI#: 760530-2015-0132-B1B
FFL#: 1-58-135-02-6C-08835

No multiple sales were reported on the Violent Crime Analysis Branch FFL Master Query and IOI (b)(6) identified no unreported multiple transfers of handguns during the inspection.

7 - Suspicious/Prohibited Purchasers

IOI (b)(6) identified no suspicious purchasers or firearms.

8 - Trace Activity

There is no history of firearm traces to this FFL.

9 - NFA/Importer/Collector/Manufacturer

This licensee does not conduct this type of firearms operations.

10 - Referrals

IOI (b)(6) generated no referrals as a result of this inspection.

11 - Other

According to the Administrative Action Chart, transferring a firearm to a prohibited person knowing or having reason to believe that the transferee is a prohibited person, might be considered justification for revocation of the Federal Firearms License. I Deal Jewelry and Pawn's employee released a rifle to a pawn customer, (b)(3) - 112 Public Law 55 125 Stat 552 after the customer answered in certification question 11c that he had been convicted of a felony. This licensee has held this FFL for approximately two years. During the past twelve months, the FFL has transferred firearms on (b)(3) ATF Forms 4473. Only (b)(3) firearm transfer was to a prohibited person who was redeeming a rifle from pawn and presented a Georgia Carry Permit in lieu of going through a NICS check. In the area where this licensee is located, the local law enforcement office conducts background checks on individuals pawning firearms. It was during one of the local law enforcement office's routine background checks when it was discovered that Mr. Robinson is a prohibited person. Currently, there is a local case being worked on Mr. Robinson as a prohibited person in possession of a firearm. Since this is the first compliance inspection conducted on this license and the prohibited person is no longer in possession of the firearm, IOI (b)(6) recommends the licensee be required to attend a warning conference with the Director of Industry Operations in lieu of revocation of license.

FIREARMS INSPECTION REPORT

Name: I Deal Brokerage, Inc.
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UI#: 760530-2015-0132-B1B
FFL#: 1-58-135-02-6C-08835

12 - Closing Actions

On March 31, 2015, IOI (b)(6) reviewed the regulatory requirements to include record keeping, conduct of business and secure gun storage and safety devices with Mr. Papathanasiou as evidenced by his and IOI (b)(6) signatures on the Acknowledgement of Federal Firearms Regulations reference guide. **Reference Exhibit C.** IOI (b)(6) also discussed violations disclosed during the inspection and documented on the Report of Violations with Mr. Papathanasiou. Both signed the report as evidence of Mr. Papathanasiou receiving the document.

IOI (b)(6) provided Manager Cooper with an updated Important ATF Phone Numbers list, and a fresh ATF I 5300.1, Youth Handgun Safety Act Poster.

13 - Violations

1. 27 CFR 478.21(a)

Nature of violation: Failure to provide the total number of firearms transferred, whether any part of the transaction was a pawn redemption, the name, address, and FFL number of the transferor, and the transferor's name and title in items 30a&b – 33, and 35 on (b)(3) - 112 Public Law 55 125 Stat 552

Licensee's response: Mr. Papathanasiou stated that it appeared his employees at the Lawrenceville store had a problem with completing the forms correctly. He asked if ATF could provide some training for the management of his three stores in order to try to eliminate some of these errors in the future.

Corrective action: IOI (b)(6) directed the licensee to review all ATF Forms 4473 more carefully prior to the disposition of a firearm. When possible have a second person review the form for accuracy.

Worksheets and Exhibits: Report of Violations No. 1, Worksheet 2, Exhibit A p 10-12.

2. 27 CFR 478.124(c)(1)

Nature of violation: Failure to, on (b)(3)-11 occasion (b)(3) - 112 Public Law 55 125 Stat 552), have the transferee to sign and date the certification in Section A, and on (b)(3) - 112 Public Law 55 125 Stat 552), failed to have the transferee date the certification.

Licensee's response: Mr. Papathanasiou stated that he would ensure that his employees were more careful in the future when having the Forms 4473 completed.

FIREARMS INSPECTION REPORT

Name: I Deal Brokerage, Inc.
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FFL#: 1-58-135-02-6C-08835

Corrective action: IOI (b)(6) directed the licensee to review all ATF Forms 4473 more carefully prior to the disposition of a firearm. When possible have a second person review the form for accuracy.

Worksheets and Exhibits: Report of Violations No. 2, Worksheet 2, Exhibit A p 4-9.

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

Nature of violation: Failure to obtain sufficient identification to verify the transferee's identity and residence address on (b)(3) - 112 Public Law 55 125 Stat 552

Licensee's response: Mr. Papathanasiou stated that he would ensure that his employees were more careful in the future when having the Forms 4473 completed.

Corrective action: IOI (b)(6) directed the licensee to review all ATF Forms 4473 more carefully prior to the disposition of a firearm. When possible have a second person review the form for accuracy.

Worksheets and Exhibits: Report of Violations No. 3, Worksheet 2, Exhibit A p 13-16.

4. 27 CFR 478.124(c)(4)

Nature of violation: Failure to complete the description of the firearm being transferred in items 26-30 of Section D on (b)(3) - 112 Public Law 55 125 Stat 552.

Licensee's response: Mr. Papathanasiou stated that he would ensure that his employees were more careful in the future when having the Forms 4473 completed. Manager (b)(6) stated that when they get busy, sometimes the sales clerks will wait until they are not busy to complete Section D and they must have overlooked this form.

Corrective action: IOI (b)(6) directed the licensee to review all ATF Forms 4473 more carefully prior to the disposition of a firearm. When possible have a second person review the form for accuracy.

Worksheets and Exhibits: Report of Violations No. 4, Worksheet 2, Exhibit A p 10-12.

5. 27 CFR 478.124(c)(5)

FIREARMS INSPECTION REPORT

Name: I Deal Brokerage, Inc.
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UI#: 760530-2015-0132-B1B
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Nature of violation: Failure to sign and date the Transferor's Certification in items 34 and 36 in Section D on (b)(3) - 112 Public Law 55 125 Stat 552 and failure to date item 36 on (b)(3) - 112 Public Law 55 125 Stat 552.

Licensee's response: Mr. Papathanasiou stated that he would ensure that his employees were more careful in the future when having the Forms 4473 completed.

Corrective action: IOI (b)(6) directed the licensee to review all ATF Forms 4473 more carefully prior to the disposition of a firearm. When possible have a second person review the form for accuracy.

Worksheets and Exhibits: Report of Violations No. 5, Worksheet 2, Exhibit A p 1-3, 10-12.

6. **27 CFR 478.99(c)(1)**

Nature of violation: Failure to stop the transfer of a firearm when the licensee has reason to believe the transferee is a prohibited person when the transferee answered he had been convicted of a felony on (b)(3) - 112 Public Law 55 125 Stat 552

Licensee's response: Mr. Papathanasiou stated that he would ensure that his employees were more careful in the future when having the Forms 4473 completed. Manager (b)(6) stated that the employee transferring this firearm was fairly inexperienced and since the transferee presented a Georgia Carry Permit the employee didn't pay close enough attention to the certification questions.

Corrective action: IOI (b)(6) directed the licensee to review all ATF Forms 4473 more carefully prior to the disposition of a firearm. When possible have a second person review the form for accuracy.

Worksheets and Exhibits: Report of Violations No. 6, Worksheet 2, Exhibit A p 17-23.

7. **27 CFR 478.125(e)**

Nature of violation: Failure to record the disposition of (b)(3) firearms transferred to other FFLs, one firearm transferred to an individual on each of (b)(3) - 112 Public Law 55 125 Stat 552

Licensee's response: Mr. Papathanasiou stated he thought they had the problem corrected with their computer to ensure transfers to other FFLs would be recorded in the A&D record properly. There was an additional step for that type transaction that

FIREARMS INSPECTION REPORT

Name: I Deal Brokerage, Inc.
Trade Name: I Deal Jewelry & Pawn

UI#: 760530-2015-0132-B1B
FFL#: 1-58-135-02-6C-08835

his employees were not doing. The other unrecorded transactions were oversights on the part of his employees.

Corrective action: IOI (b)(6) directed the licensee to consider doing periodic inventories of their firearms and reconcile the inventory to the A&D printout.

Worksheets and Exhibits: Report of Violations No. 7, Worksheet 1, Exhibit A p 17-23 and Exhibit B.

X

Industry Operations Investigator

Index of Worksheets and Exhibits

Worksheet 1 – Inventory Discrepancies

Worksheet 2 – ATF Forms 4473 Discrepancies

Exhibit A – ATF Forms 4473 Transaction (b)(3) - 112 Public Law 55 125 Stat 552

Exhibit B – (b)(3) - 112 Public Law 55 125 Stat 552

and ATF Forms 4473 Transaction (b)(3) - 112 Public Law 55 125

Exhibit C – Acknowledgement of Federal Firearms Regulations



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
2600 Century Parkway NE, Suite 300
Atlanta, Georgia 30345

www.atf.gov

June 22, 2015

760530 (b)(6)
5373

Mr. Stravos Papathanasiou
I Deal Brokerage, Inc.
73 Gwinnett Drive
Lawrenceville, Georgia 30046

FFL No.: 1-58-135-02-6C-08835

Dear Mr. Papathanasiou:

During a recent compliance inspection at your firearms business covering the period of March 24, 2014 through March 23, 2015, you were cited for violations of 27 Code of Federal Regulations, Part 478. The violations were discussed with you during the inspection. A copy of the Report of Violations, Form 5030.5, issued at the time of the inspection is enclosed.

You should be aware that any willful violations of the Gun Control Act may result in revocation of your Federal firearms license. As a result of the recently cited violations, it is important that we have a meeting with you to discuss the violations found. The conference will be held on July 14, 2015 at 1 PM at 2600 Century Parkway, NE, Atlanta, GA 30345. The agenda for the meeting will include a discussion of the reasons for the violations, a review of the legal requirements, and a discussion of steps to be taken by you to ensure future compliance. Although we do not believe it necessary, legal counsel may assist you at your own expense if you so choose. Please bring a compliance plan with your documentation verifying the corrective actions you have taken or will implement to ensure future compliance.

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 to aid in this effort to combat violent crime.

Mr. Stravos Papathanasiou
I Deal Brokerage, Inc.

We will conduct a follow-up inspection in the future. Any violations, either repeat or otherwise, could be viewed as willful and may result in the revocation of your license.

Please contact Industry Operations Investigator (b)(6) at (b)(6) to confirm this appointment, and to ask any questions you may have regarding this conference. I look forward to meeting with you to resolve these issues.

Sincerely yours,

Diana D. Mitchell
Director of Industry Operations

Enclosure

c: Atlanta V (IO) Area Office
Federal Firearms Licensing Center



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Atlanta, Georgia 30345

JUL 15 2015

www.atf.gov

760530(b)(6)
5373

Mr. Stavros M. Papathanasiou
I Deal Brokerage, Inc. d/b/a I Deal Jewelry & Pawn
73 Gwinnett Drive
Lawrenceville, Georgia 30046

1-58-135-02-6C-08835

Dear Mr. Papathanasiou:

This letter is a follow-up to the warning conference held with you on July 14, 2015 at the Atlanta Field Division's Office located at 2600 Century Parkway, NE Atlanta, Georgia 30345. During this conference, the violations cited during the inspection covering the period March 24, 2014 to March 23, 2015, and the necessary corrective action to prevent the violations from recurring were discussed.

You were given the opportunity to comment on the violations and what specific action you have taken to ensure that the violations will not recur.

Regarding Violations # 1, 2, 4, 5, where you failed to obtain complete and accurate information on the ATF Forms 4473 in accordance with the instructions on the form. You stated that you will be reviewing the forms several times before the purchaser leaves the store and before the forms are filed to ensure they have been completed. Additionally you stated that the forms will be reviewed several times a month.

Regarding Violation # 3 where you failed to obtain sufficient identification to properly verify the transferee's identity and residence address. You stated that you will be obtaining additional documentation to verify the current address and identity of the purchaser.

Regarding Violation # 6 where you failed to prevent the transfer of a firearm to a person who appeared to be prohibited at the time of transfer when the transferee answered he had been convicted of a felony, and was later determined to be a prohibited person. You stated that you will stop the transfer of a firearm when persons answer yes to any of the prohibiting questions in section 11 of the ATF Form 4473.

Mr. Stavros M. Papathanasiou
I Deal Brokerage, Inc. d/b/a I Deal Jewelry & Pawn

Regarding Violation # 7 where you failed to record the date of disposition for firearms in the Acquisition & Disposition record book. You stated that the errors were due to a computer glitch and that you are manually logging into the computer system to record the date the firearm was actually sold/transferred.

The violations for which you were cited could adversely impact law enforcement's ability to reduce violent crime and protect the public. You are reminded that future violations, repeat or otherwise, could be viewed as willful and may result in the revocation of your license. You may anticipate further inspections to ensure your compliance.

Please contact us at (404) 417-2670 if you have any questions concerning your responsibilities as a licensee or if you require further clarification about particular requirements of the Federal Firearms Laws.

Sincerely yours,



Diana D. Mitchell
Director, Industry Operations

cc: Area Supervisor, Group V (IO)
Federal Firearms Licensing Center

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) I Deal Brokerage, Inc. I Deal Jewelry & Pawn 73 Gwinnett Drive Lawrenceville, GA 30046, Gwinnett		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 760530-2015-0132-B1B		
		3. PERMIT/LICENSE NUMBER 158135026C08835	4a. TARGET DATE 3/27/2015	4b. TARGET HOURS
		5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		
6. ATF OFFICER(S) ASSIGNED (b)(6) - Lead Investigator				
7. ASSIGNED BY (SIGNATURE, TITLE AND DATE) (b)(6) Area Supervisor, 02/27/2015				
8. PURPOSE/SPECIAL INSTRUCTIONS The inspection should be conducted in accordance with the "Firearms Disposition Emphasis Inspection Quick Reference Guide." No inspection since FFL issued. Also, see the Memorandum Record of Conversation from Acting Area Supervisor (b)(6) and other attachments to be considered during the inspection.				
9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)
NO. OF VIOLATIONS	7	NO. OF REFERRALS		2111 - PER DIEM
NO. OF TECS CHECKS		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: 06/03/2015 Viols DIO (or Delegate) Held WC ILO Revocation				
12. TIME ACCOUNTING DATA				
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)				
MAR 0	42.50			
APR 0	13.50			
MAY 0	2.00			
JUN 0	14.00			
JUL 0	4.00			
ATF OFFICER'S SUBTOTAL	76.00	ATF OFFICER'S SIGNATURE		
TOTAL HOURS	76.00			

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) I Deal Brokerage, Inc. I Deal Jewelry & Pawn 73 Gwinnett Drive Lawrenceville, GA 30046, Gwinnett	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 760530-2015-0132-B1B		
	3. PERMIT/LICENSE NUMBER 158135026C08835	4a. TARGET DATE 3/27/2015	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Recommendation: Violations DIO (or Delegate) Held WC ILO Revocation.

Justification - According to the Administrative Action Chart, transferring a firearm to a prohibited person knowing or having reason to believe that the transferee is a prohibited person, might be considered justification for revocation of the Federal Firearms License. I Deal Jewelry and Pawn's employee (b)(3) - 112 Public Law 55 125 Stat 552 (b)(6)

This licensee has held this FFL for approximately two years. During the past twelve months, the FFL has transferred firearms on ATF Form 4473. Only (b)(3) firearm transfer was to a prohibited person who was redeeming a rifle from pawn and presented a Georgia Carry Permit in lieu of going through a NICS check. In the area where this licensee is located, the local law enforcement office conducts background checks on individuals pawning firearms. It was during one of the local law enforcement office's routine background checks when it was discovered that (b)(6) is a prohibited person. Currently, there is a local case being worked on (b)(6) as a prohibited person in possession of a firearm. Since this is the first compliance inspection conducted on this licensee and the prohibited person is no longer in possession of the firearm, Therefore, it is recommended that the licensee be required to attend a warning conference with the Director of Industry Operations in lieu of revocation of license

Viols DIO (or Delegate) Held WC ILO Revocation

☒ REVIEWED ☒ CONCUR ☒ SEE COMMENTS ☐ FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6) - Area Supervisor	REVIEW DATE 05/06/2015
---	---------------------------

REVIEW COMMENTS AND RECOMMENDATION

Recommendation: Violations DIO (or Delegate) Held WC ILO Revocation.

Justification - According to the Administrative Action Chart, transferring a firearm to a prohibited person knowing or having reason to believe that the transferee is a prohibited person, might be considered justification for revocation of the Federal Firearms License. I Deal Jewelry and Pawn's employee (b)(3) - 112 Public Law 55 125 Stat 552 (b)(6)

This licensee has held this FFL for approximately two years. During the past twelve months, the FFL has transferred firearms on ATF Form 4473. Only (b)(3) firearm transfer was to a prohibited person who was redeeming a rifle from pawn and presented a Georgia Carry Permit in lieu of going through a NICS check. In the area where this licensee is located, the local law enforcement office conducts background checks on individuals pawning firearms. It was during one of the local law enforcement office's routine background checks when it was discovered that (b)(6) is a prohibited person. Currently, there is a local case being worked on (b)(6) as a prohibited person in possession of a firearm. Since this is the first compliance inspection conducted on this licensee and the prohibited person is no longer in possession of the firearm, Therefore, it is recommended that the licensee be required to attend a warning conference with the Director of Industry Operations in lieu of revocation of license

Viols DIO (or Delegate) Held WC ILO Revocation

☒ REVIEWED ☒ CONCUR ☒ SEE COMMENTS ☒ FINAL DISPOSITION

SIGNATURE AND TITLE DDMITCHEL2 - Director, Industry Operations	REVIEW DATE 06/01/2015
---	---------------------------

ROUTING SEQUENCE AND DATE

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

CONTROL FILE POSTED DATE _____

Report of Violations

Instructions

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

Name of Proprietor I Deal Brokerage, Inc. I Deal Jewelry & Pawn	Street Address 73 Gwinnett Drive	City Lawrenceville	State GA	Zip Code 30046-	County Gwinnett	Page 1 of 4 Pages
License/Permit/Registry Number (If any) 158135026C08835	Expiration Date 3/1/2016	Date(s) or Period of Inspection 03/24/2015 through 03/30/2015				

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:

Failure to provide the total number of firearms transferred, whether any part of the transaction was a pawn redemption, the name, address, and FFL number of the transferor, and the transferor's name and title in items 30a&b - 33, and 35 on (b)(3) - 112 Public Law 55 125 Stat 552 ATF Forms 4473 (b)(3) - 112 Public Law 55

Citation: 27 CFR 478.21(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee completed the missing information based on information recorded in the computerized records. Completed information was dated and initialed by the manager.

Number: 2

Nature of Violation:

On (b)(3) - 112 Public Law 55 125 Stat 552 Form 4473, the transferee failed to sign and date the certification in Section A and on an additional Form 4473 the transferee failed to date the certification. (b)(3) - 112 Public Law 55 125 Stat 552

Citation: 27 CFR 478.124(c)(1)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

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 I Deal Brokerage, Inc. I Deal Jewelry & Pawn	Street Address 73 Gwinnett Drive	City Lawrenceville	State GA	Zip Code 30046-	County Gwinnett	Page 2 of 4 Pages
License/Permit/Registry Number (If any) 158135026C08835	Expiration Date 3/1/2016	Date(s) or Period of Inspection 03/24/2015 through 03/30/2015				

Inspection Results

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

- Number:** 3
- Nature of Violation:** Failure to obtain sufficient identification to verify the transferee's identity and residence address on (b)(3) transaction (b)(3) - 112 Public Law 55 125 Stat 552
- Citation:** 27 CFR 478.124(c)(3)(i)
- Date Corrections to be Made:**
(If not corrected immediately)
- Corrective Action to be Taken:** (If not corrected immediately) In the future, ensure that the GA Carry Permit has a photograph of the transferee and a current residence address when using this document as identification to verify the transferee.
- Number:** 4
- Nature of Violation:** Failure to complete the description of the firearm being transferred in items 26-30 of Section D on (b)(3) Form 4473 (b)(3) - 112 Public Law 55 125 Stat 552
- Citation:** 27 CFR 478.124(c)(4)
- Date Corrections to be Made:**
(If not corrected immediately)
- Corrective Action to be Taken:** (If not corrected immediately) Manager (b)(3) 112 PL 55 completed the form from information found in the computerized record of this transaction.

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 I Deal Brokerage, Inc. I Deal Jewelry & Pawn	Street Address 73 Gwinnett Drive	City Lawrenceville	State GA	Zip Code 30046-	County Gwinnett	Page 3 of 4 Pages
License/Permit/Registry Number (If any) 158135026C08835	Expiration Date 3/1/2016	Date(s) or Period of Inspection 03/24/2015 through 03/30/2015				

Inspection Results

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

Number: 5

Nature of Violation:

Failure to sign and date the Transferor's Certification in items 34 and 36 in Section D on Form 4473 and failure to date item 36 on one Form 4473 (b)(3) - 112 Public Law 55 125 Stat 552

Citation: 27 CFR 478.124(c)(5)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee completed the missing information based on information recorded in the computerized records. Completed information was dated and initialed by the manager.

Number: 6

Nature of Violation:

Failure to stop the transfer of a firearm when the licensee has reason to believe the transferee is a prohibited person when the transferee answered he had been convicted of a felony (b)(3) - 112 Public Law 55 125 Stat 552

Citation: 27 CFR 478.99(c)(1)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Report of Violations

Instructions

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

Name of Proprietor I Deal Brokerage, Inc. I Deal Jewelry & Pawn	Street Address 73 Gwinnett Drive	City Lawrenceville	State GA	Zip Code 30046-	County Gwinnett	Page 4 of 4 Pages
License/Permit/Registry Number (If any) 158135026C08835	Expiration Date 3/1/2016	Date(s) or Period of Inspection 03/24/2015 through 03/30/2015				

Inspection Results

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

Number: 7

Nature of Violation:

Failure to record the disposition of (b)(3) firearms transferred to other FFLs. (b)(3) firearm transferred to an individual on each of (b)(3) 112 PL 55 125 STAT 552 and (b)(3) 112 PL 55 125 STAT 552 in the A&D record.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Transfers for (b)(3) firearms transferred to other FFLs were documented by a sales receipt and on file with the completed ATF Forms 4473 but the disposition information was not shown in the A&D log. Manager (b)(6) found an additional step that needed to be completed in the computer for this type transaction in order for the disposition information to show up in the disposition record and corrected this error by completing the step on each transaction. The (b)(3) 112 PL 55 125 STAT unrecorded ATF Forms 4473 (#S (b)(3) 112 PL 55 125 STAT) should be posted as dispositions in the computerized records.

Citation: 27 CFR 478.125(e)

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

Date
3/31/15

Date
3/31/2015

FIREARMS INSPECTION REPORT

Name: I Deal Brokerage, Inc.
Trade Name: I Deal Jewelry & Pawn

UI#: 760530-2015-0132-B1B
FFL#: 1-58-135-02-6C-08835

Address: 73 Gwinnett Drive
Lawrenceville, GA 30046

1 - Introduction

Inspection Profile:

On March 24-25, 2015, Industry Operations Investigators (IOI) (b)(6) conducted a Firearms Disposition Emphasis compliance inspection and special instructions as noted on ATF EF 5700.14. Mr. Stravos (Steven) Papathanasiou, owner was notified by Store Manager (b)(6) upon IOI (b)(6) arrival that a compliance inspection would be conducted. Manager (b)(6) was available during the inspection. The closing conference was held on March 31, 2015 with Mr. Papathanasiou at his Norcross, Georgia pawnshop. The inspection covered the period March 24, 2014 through March 23, 2015.

A query of the Federal Licensing System (FLS) disclosed no Special Attention Flags (SAF) or ATF investigations. IOI (b)(6) conducted a NCIC check on Stavros M. Papathanasious on April 2, 2015 resulting in no prohibiting factors.

Business Profile:

The licensed premises are in a commercially zoned area in Lawrenceville, Georgia. During the past 12 months, the licensee acquired (b)(4) firearms. They disposed of (b)(4) firearms. All of the firearms in inventory are pawned firearms. The suppliers during this period were individuals. I Deal Jewelry & Pawn accepts firearms on pawn and facilitates internet firearms transactions. Any firearms not picked up out of pawn are offered for sale over the internet. The licensee does not purchase new firearms for retail sale or participate in gunshows. The business operates online at Gunbroker.com and www.IdealJewelryAndPawn.com. The LLC has held this Federal Firearms License (FFL) 1-58-135-02-08835 since February 7, 2013. Mr. Papathanasiou is also the sole responsible person on two additional FFLs: 1-58-135-02-6D-08833, I Deal Pawn & Cycle, LLC, d/b/a I Deal Pawn & Cycle, Snellville, Georgia and 1-58-121-02-6C-08834, I Deal Jewelry & Pawn, Inc., d/b/a I Deal Jewelry & Pawn Norcross, Georgia. According to the website, I Deal Jewelry & Pawn also operates as a pawn shop at 3593 Northcrest Road, Doraville, Georgia. Information on file in the Federal Licensing System (FLS) shows 3008 Roswell, LLC, d/b/a I Deal Jewlery & Pawn holds FFL 1-58-089-02-5M-08584 with licensed premises at 3593 Northcrest Road, Doraville, Georgia. Mr. Papathanasiou is not shown as a responsible person on the Doraville license. Alan Zager is shown as the sole owner for the Doraville license. I Deal Brokerage, Inc. has a business license with the City of Lawrenceville. The licensee utilizes no off-site storage.

FIREARMS INSPECTION REPORT

Name: I Deal Brokerage, Inc.
Trade Name: I Deal Jewelry & Pawn

UI#: 760530-2015-0132-B1B
FFL#: 1-58-135-02-6C-08835

Ownership and Control:

Stravos (Steve) Papathanasiou is the sole officer of I Deal Brokerage, Inc. He confirmed that he is the sole officer and director and responsible person on the license and that there have been no changes to the business structure since this license was issued. FLS accurately reflects this information.

Variance:

The licensee does not have any approved variances and Mr. Papathanasiou did not request any during this inspection. The licensee uses computerized records.

2 - Recommendation

Warning Conference with DIO in lieu of Revocation

3 - Inspection History

This is the first firearms compliance inspection held with the licensee.

Date and Type of Inspection: 02/07/2013 Firearms Qualification Inspection
UI#: 760530-2013-0124-B1B
Inspection Results: 1-58-135-02-PA-08835 issued
Cited Violations: None

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

The licensee maintains computerized A&D records. The FFL had never printed an A&D record for this license before the commencement of this inspection. The A&D record shows (b)(3) open entries; however, there were 24 firearms in physical inventory on March 25, 2015 for a difference of (b)(3). (b)(3) 112 PL 55 125 STAT 552 firearms were transferred to other FFLs but were not showing as dispositions in the A&D record. **Exhibit B p1-148.** (b)(3) 112 PL 55 firearms were transferred on ATF Forms 4473 dated (b)(3) 112 PL 55 125 STAT 552 but were not showing as dispositions on the A&D record. **Exhibit B p1-4, 16-19 and Exhibit A p17-23.** The licensee was cited in violation of 27 CFR 478.125(e) for failure to record the disposition of (b)(3) firearms. **Reference Worksheet 1, Exhibit B, Exhibit A p17-23 and ROV 7.**

There were no theft/loss reports submitted by the licensee during this inspection period. The A&D record was printed in the proper format. There were 109 firearms on ATF Forms 4473 on file that were traced to the disposition information in the A&D record. (b)(3) 112 PL 55 of the 109 firearms were not recorded as dispositions in the A&D record. There were (b)(3) firearms on sales receipts transferring the firearm to another FFL. The disposition information for the (b)(3) firearms was not shown in the A&D

FIREARMS INSPECTION REPORT

Name: I Deal Brokerage, Inc.
Trade Name: I Deal Jewelry & Pawn

UI#: 760530-2015-0132-B1B
FFL#: 1-58-135-02-6C-08835

record due to employees leaving out a step when they transferred a firearms to another FFL. This error was identified and corrected during the inspection. IOI (b)(6) identified no trafficking, obliterated serial numbers, or illegal firearms. All employees are trained on how to accurately complete a firearm sale or redemption.

5 - ATF Forms 4473 – NICS & Other Dispositions

There are (b)(3) ATF Forms 4473 on file for transfers of firearms for the past twelve months. IOI (b)(6) reviewed all forms. On (b)(3) 112 form, the licensee failed to provide information required in items 30 a&b – 33, and 35 in violation of 27 CFR 478.21(a). **Reference Worksheet 2, Exhibit A p 10-12, and ROV 1.** On (b)(3) 112 Form 4473, the transferee failed to sign and date the certification in Section A and on an additional Form 4473, the transferee failed to date the certification in item 17 in violation of 27 CFR 478.124(c)(1). **Reference Worksheet 2, Exhibit A p 4-9, and ROV 2.** The licensee failed to obtain sufficient identification to verify the transferee's identity and residence address on (b)(3) 112 form in violation of 27 CFR 478.124(c)(3)(i). **Reference Worksheet 2, Exhibit A p 13-16, and ROV 3.** On (b)(3) 112 form, the licensee failed to complete the description of the firearm being transferred in items 26-30 of Section D in violation of 27 CFR 478.124(c)(4). **Reference Worksheet 2, Exhibit A p 10-12, and ROV 4.** On (b)(3) 112 form, the licensee failed to sign and date the Transferor's Certification in items 34 and 36, and on (b)(3) 112 form, he failed to date item 36 in violation of 27 CFR 478.124(c)(5). **Reference Worksheet 2, Exhibit A p 1-3 and 10-12, and ROV 5.** The licensee was cited in violation of 27 CFR 478.99(c)(1) when the licensee failed to stop the transfer of a firearm when the licensee had reason to believe the transferee is a prohibited person when the transferee answered he had been convicted of a felony. **Reference Worksheet 2, Exhibit A p 17 - 23, and ROV 6.** IOI (b)(6) received information in the form of a referral from ATF TFO (b)(6) and the Lawrenceville Police Department (LPD) concerning this transaction. Pawnbrokers in Lawrenceville provide information on all items pawned and the person pawning the items on a daily basis. LPD discovered that (b)(6) pawned a rifle on 1/26/2015 at this I Deal Jewelry & Pawn location and records show that (b)(3) - 112 Public Law 55 125 Stat 552 (b)(6)

The FFL audit log showed two denied transactions for the period of November 30, 1998 to March 23, 2015; and 13 proceed, no delayed, no open, and no cancelled or non-denied under appeal transactions for the period January 22, 2015 to March 23, 2015. All fifteen transactions were verified with ATF Forms 4473 on file.

6 – Multiple Sales

FIREARMS INSPECTION REPORT

Name: I Deal Brokerage, Inc.
Trade Name: I Deal Jewelry & Pawn

UI#: 760530-2015-0132-B1B
FFL#: 1-58-135-02-6C-08835

No multiple sales were reported on the Violent Crime Analysis Branch FFL Master Query and IOI (b)(6) identified no unreported multiple transfers of handguns during the inspection.

7 - Suspicious/Prohibited Purchasers

IOI (b)(6) identified no suspicious purchasers or firearms.

8 - Trace Activity

There is no history of firearm traces to this FFL.

9 - NFA/Importer/Collector/Manufacturer

This licensee does not conduct this type of firearms operations.

10 - Referrals

IOI (b)(6) generated no referrals as a result of this inspection.

11 - Other

According to the Administrative Action Chart, transferring a firearm to a prohibited person knowing or having reason to believe that the transferee is a prohibited person, might be considered justification for revocation of the Federal Firearms License. I Deal Jewelry and Pawn's employee released a rifle to a pawn customer, (b)(6) on February 9, 2015, after the customer answered in certification question 11c that he had been convicted of a felony. This licensee has held this FFL for approximately two years. During the past twelve months, the FFL has transferred firearms on (b)(3) ATF Forms 4473. Only (b)(3) 11c firearm transfer was to a prohibited person who was redeeming a rifle from pawn and presented a Georgia Carry Permit in lieu of going through a NICS check. In the area where this licensee is located, the local law enforcement office conducts background checks on individuals pawning firearms. It was during one of the local law enforcement office's routine background checks when it was discovered that (b)(6) is a prohibited person. Currently, there is a local (b)(6), (b)(7)(C).

Since this is the first compliance inspection conducted on this license and the prohibited person is no longer in possession of the firearm, IOI (b)(6) recommends the licensee be required to attend a warning conference with the Director of Industry Operations in lieu of revocation of license.

FIREARMS INSPECTION REPORT

Name: I Deal Brokerage, Inc.
Trade Name: I Deal Jewelry & Pawn

UI#: 760530-2015-0132-B1B
FFL#: 1-58-135-02-6C-08835

12 - Closing Actions

On March 31, 2015, IOI (b)(6) reviewed the regulatory requirements to include record keeping, conduct of business and secure gun storage and safety devices with Mr. Papathanasiou as evidenced by his and IOI (b)(6) signatures on the Acknowledgement of Federal Firearms Regulations reference guide. **Reference Exhibit C.** IOI (b)(6) also discussed violations disclosed during the inspection and documented on the Report of Violations with Mr. Papathanasiou. Both signed the report as evidence of Mr. Papathanasiou receiving the document.

IOI (b)(6) provided Manager (b)(6) with an updated Important ATF Phone Numbers list, and a fresh ATF I 5300.1, Youth Handgun Safety Act Poster.

13 - Violations

1. 27 CFR 478.21(a)

Nature of violation: Failure to provide the total number of firearms transferred, whether any part of the transaction was a pawn redemption, the name, address, and FFL number of the transferor, and the transferor's name and title in items 30a&b – 33, and 35 on (b)(3) - 112 Public Law 55 125 Stat 552

Licensee's response: Mr. Papathanasiou stated that it appeared his employees at the Lawrenceville store had a problem with completing the forms correctly. He asked if ATF could provide some training for the management of his three stores in order to try to eliminate some of these errors in the future.

Corrective action: IOI (b)(6) directed the licensee to review all ATF Forms 4473 more carefully prior to the disposition of a firearm. When possible have a second person review the form for accuracy.

Worksheets and Exhibits: Report of Violations No. 1, Worksheet 2, Exhibit A p 10-12.

2. 27 CFR 478.124(c)(1)

Nature of violation: Failure to, on (b)(3) 112 Public Law 55 125 Stat 552 occasion (b)(3) - 112 Public Law 55 125 Stat 552, have the transferee to sign and date the certification in Section A, and on (b)(3) - 112 Public Law 55 125 Stat 552 occasion (b)(3) - 112 Public Law 55 125 Stat 552), failed to have the transferee date the certification.

Licensee's response: Mr. Papathanasiou stated that he would ensure that his employees were more careful in the future when having the Forms 4473 completed.

FIREARMS INSPECTION REPORT

Name: I Deal Brokerage, Inc.
Trade Name: I Deal Jewelry & Pawn

UI#: 760530-2015-0132-B1B
FFL#: 1-58-135-02-6C-08835

Corrective action: IOI (b)(6) directed the licensee to review all ATF Forms 4473 more carefully prior to the disposition of a firearm. When possible have a second person review the form for accuracy.

Worksheets and Exhibits: Report of Violations No. 2, Worksheet 2, Exhibit A p 4-9.

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

Nature of violation: Failure to obtain sufficient identification to verify the transferee's identity and residence address on (b)(3) - 112 Public Law 55 125 Stat 552

Licensee's response: Mr. Papathanasiou stated that he would ensure that his employees were more careful in the future when having the Forms 4473 completed.

Corrective action: IOI (b)(6) directed the licensee to review all ATF Forms 4473 more carefully prior to the disposition of a firearm. When possible have a second person review the form for accuracy.

Worksheets and Exhibits: Report of Violations No. 3, Worksheet 2, Exhibit A p 13-16.

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

Nature of violation: Failure to complete the description of the firearm being transferred in items 26-30 of Section D on (b)(3) - 112 Public Law 55 125 Stat 552

Licensee's response: Mr. Papathanasiou stated that he would ensure that his employees were more careful in the future when having the Forms 4473 completed. Manager (b)(6) stated that when they get busy, sometimes the sales clerks will wait until they are not busy to complete Section D and they must have overlooked this form.

Corrective action: IOI (b)(6) directed the licensee to review all ATF Forms 4473 more carefully prior to the disposition of a firearm. When possible have a second person review the form for accuracy.

Worksheets and Exhibits: Report of Violations No. 4, Worksheet 2, Exhibit A p 10-12.

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

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Name: I Deal Brokerage, Inc.
Trade Name: I Deal Jewelry & Pawn

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Nature of violation: Failure to sign and date the Transferor's Certification in items 34 and 36 in Section D on (b)(3) - 112 Public Law 55 125 Stat 552 and failure to date item 36 on (b)(3) - 112 Public Law 55 125 Stat 552

Licensee's response: Mr. Papathanasiou stated that he would ensure that his employees were more careful in the future when having the Forms 4473 completed.

Corrective action: IOI (b)(6) directed the licensee to review all ATF Forms 4473 more carefully prior to the disposition of a firearm. When possible have a second person review the form for accuracy.

Worksheets and Exhibits: Report of Violations No. 5, Worksheet 2, Exhibit A p 1-3, 10-12.

6. **27 CFR 478.99(c)(1)**

Nature of violation: Failure to stop the transfer of a firearm when the licensee has reason to believe the transferee is a prohibited person when the transferee answered he had been convicted of a felony on (b)(3) - 112 Public Law 55 125 Stat 552

Licensee's response: Mr. Papathanasiou stated that he would ensure that his employees were more careful in the future when having the Forms 4473 completed. Manager (b)(6) stated that the employee transferring this firearm was fairly inexperienced and since the transferee presented a Georgia Carry Permit the employee didn't pay close enough attention to the certification questions.

Corrective action: IOI (b)(6) directed the licensee to review all ATF Forms 4473 more carefully prior to the disposition of a firearm. When possible have a second person review the form for accuracy.

Worksheets and Exhibits: Report of Violations No. 6, Worksheet 2, Exhibit A p 17-23.

7. **27 CFR 478.125(e)**

Nature of violation: Failure to record the disposition of (b)(3) 1 firearms transferred to other FFLs, (b)(3) 112 firearm transferred to an individual on each of (b)(3) 112 Forms 4473 (b)(3) 112 PL 55 125 STAT 552, and (b)(3) - 112 Public Law 55 125 (b)(3) - 112 Public Law 55 125 Stat 552 (b)(6)

Licensee's response: Mr. Papathanasiou stated he thought they had the problem corrected with their computer to ensure transfers to other FFLs would be recorded in the A&D record properly. There was an additional step for that type transaction that

FIREARMS INSPECTION REPORT

Name: I Deal Brokerage, Inc.
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his employees were not doing. The other unrecorded transactions were oversights on the part of his employees.

Corrective action: IOI (b)(6) directed the licensee to consider doing periodic inventories of their firearms and reconcile the inventory to the A&D printout.

Worksheets and Exhibits: Report of Violations No. 7, Worksheet 1, Exhibit A p 17-23 and Exhibit B.

6/3/2015	
X	(b) (6)
Industry Operations Investigator Signed by: (b)(6)	

Index of Worksheets and Exhibits

Worksheet 1 – Inventory Discrepancies

Worksheet 2 – ATF Forms 4473 Discrepancies

Exhibit A – ATF Forms 4473 Transaction #s (b)(3) 112 PL 55 125 STAT 552

Exhibit B – Invoices (b)(3) - 112 Public Law 55 125 Stat 552

Exhibit C – Acknowledgement of Federal Firearms Regulations



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
2600 Century Parkway NE, Suite 300
Atlanta, Georgia 30345

www.atf.gov

June 22, 2015

760530 (b) (6)
5373

Mr. Stravos Papathanasiou
I Deal Brokerage, Inc.
73 Gwinnett Drive
Lawrenceville, Georgia 30046

FFL No.: 1-58-135-02-6C-08835

Dear Mr. Papathanasiou:

During a recent compliance inspection at your firearms business covering the period of March 24, 2014 through March 23, 2015, you were cited for violations of 27 Code of Federal Regulations, Part 478. The violations were discussed with you during the inspection. A copy of the Report of Violations, Form 5030.5, issued at the time of the inspection is enclosed.

You should be aware that any willful violations of the Gun Control Act may result in revocation of your Federal firearms license. As a result of the recently cited violations, it is important that we have a meeting with you to discuss the violations found. The conference will be held on July 14, 2015 at 1 PM at 2600 Century Parkway, NE, Atlanta, GA 30345. The agenda for the meeting will include a discussion of the reasons for the violations, a review of the legal requirements, and a discussion of steps to be taken by you to ensure future compliance. Although we do not believe it necessary, legal counsel may assist you at your own expense if you so choose. Please bring a compliance plan with your documentation verifying the corrective actions you have taken or will implement to ensure future compliance.

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 to aid in this effort to combat violent crime.

Mr. Stravos Papathanasiou
I Deal Brokerage, Inc.

We will conduct a follow-up inspection in the future. Any violations, either repeat or otherwise, could be viewed as willful and may result in the revocation of your license.

Please contact Industry Operations Investigator (b)(6) at (b)(6) to confirm this appointment, and to ask any questions you may have regarding this conference. I look forward to meeting with you to resolve these issues.

Sincerely yours,

(b)(6)
Director of Industry Operations

Enclosure

c: Atlanta V (IO) Area Office
Federal Firearms Licensing Center



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Atlanta, Georgia 30345

JUL 15 2015

www.atf.gov

760530: (b)(3) 112 P
5373

Mr. Stavros M. Papathanasiou
I Deal Brokerage, Inc. d/b/a I Deal Jewelry & Pawn
73 Gwinnett Drive
Lawrenceville, Georgia 30046

1-58-135-02-6C-08835

Dear Mr. Papathanasiou:

This letter is a follow-up to the warning conference held with you on July 14, 2015 at the Atlanta Field Division's Office located at 2600 Century Parkway, NE Atlanta, Georgia 30345. During this conference, the violations cited during the inspection covering the period March 24, 2014 to March 23, 2015, and the necessary corrective action to prevent the violations from recurring were discussed.

You were given the opportunity to comment on the violations and what specific action you have taken to ensure that the violations will not recur.

Regarding Violations # 1, 2, 4, 5, where you failed to obtain complete and accurate information on the ATF Forms 4473 in accordance with the instructions on the form. You stated that you will be reviewing the forms several times before the purchaser leaves the store and before the forms are filed to ensure they have been completed. Additionally you stated that the forms will be reviewed several times a month.

Regarding Violation # 3 where you failed to obtain sufficient identification to properly verify the transferee's identity and residence address. You stated that you will be obtaining additional documentation to verify the current address and identity of the purchaser.

Regarding Violation # 6 where you failed to prevent the transfer of a firearm to a person who appeared to be prohibited at the time of transfer when the transferee answered he had been convicted of a felony, and was later determined to be a prohibited person. You stated that you will stop the transfer of a firearm when persons answer yes to any of the prohibiting questions in section 11 of the ATF Form 4473.

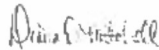
Mr. Stavros M. Papathanasiou
I Deal Brokerage, Inc. d/b/a I Deal Jewelry & Pawn

Regarding Violation # 7 where you failed to record the date of disposition for firearms in the Acquisition & Disposition record book. You stated that the errors were due to a computer glitch and that you are manually logging into the computer system to record the date the firearm was actually sold/transferred.

The violations for which you were cited could adversely impact law enforcement's ability to reduce violent crime and protect the public. You are reminded that future violations, repeat or otherwise, could be viewed as willful and may result in the revocation of your license. You may anticipate further inspections to ensure your compliance.

Please contact us at (b)(3) 112 PL 55 126 STAT 552 if you have any questions concerning your responsibilities as a licensee or if you require further clarification about particular requirements of the Federal Firearms Laws.

Sincerely yours,



Diana D. Mitchell
Director, Industry Operations

cc: Area Supervisor, Group V (IO)
Federal Firearms Licensing Center