

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Academy, LTD Academy Sports + Outdoors #47 2643 NW Loop 410 San Antonio, TX 78230, Bexar	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 782085-2015-0463-B1B		
	3. PERMIT/LICENSE NUMBER 574029016M01843	4a. TARGET DATE 9/30/2015	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

6. ATF OFFICER(S) ASSIGNED

(b)(6) Assigned Investigator
(b)(6) Assigned Investigator
(b)(6) Lead Investigator
(b)(6) Assigned Investigator

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
(b)(6) Acting Area Supervisor, 05/11/2015

8. PURPOSE/SPECIAL INSTRUCTIONS

Please conduct an inspection according to the SWDE guidelines of a full compliance inspection, incorporating trafficking detection strategies from the D/E inspection program. Make referrals according to SWBI guidelines. Determine if any change in ownership or control has taken place. Update phone/fax numbers and information on responsible persons. Obtain latest copy of variance letter if applicable.

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	37	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: 02/11/2016

On November 3 through 8, 13, 18 and 24, 2015, Industry Operations Investigators (IO) (b)(6) and Senior Investigator (SI) (b)(6) conducted an on-site compliance inspection for Academy, LTD d.b.a. Academy Sports + Outdoors #47. The premises are located at 2643 Northwest Loop 410, San Antonio, Texas 78230. IO (b)(6) interviewed (b)(6) (b)(6) Store Director and Responsible Person, who was identified by his Texas Driver License. No other Federal, State or local agencies participated in the inspection.

Prior to the inspection, a "Voluntary Self-disclosure Concerning Firearms Raffle Recordkeeping at Academy's Vance Jackson Store #47" was provided to (b)(6) ATF Director of Industry Operations, Houston Field Division, by (b)(6) (b)(6) attorneys at law. IO (b)(6) lead investigator for the inspection, was provided a printed copy of the disclosure. Because of the time period reflected by the disclosure, the inspection period was expanded to cover January 13, 2012 to November 3, 2015. There were no suspicious purchasers or traffickers discovered during the inspection and no missing firearms during the inventory check. There were seven violations cited: 27 CFR 478.124(c)(5), 27 CFR 478.124(c)(4), 27 CFR 478.124(c)(1), 27 CFR 478.124(c)(3)(i), 27 CFR 478.102(a), 27 CFR 478.124(a) and 27 CFR 478.125(e).

Viols WC with WL and Recall

12. TIME ACCOUNTING DATA		
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)	
NOV 2015	32.00	
ATF OFFICER'S SUBTOTAL	32.00	ATF OFFICER'S SIGNATURE

Assignment and Report

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	3. PERMIT/LICENSE NUMBER 574029016M01843	4a. TARGET DATE 9/30/2015	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

12. TIME ACCOUNTING DATA		
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)		
NOV 2015	34.00	
ATF OFFICER'S SUBTOTAL	34.00	ATF OFFICER'S SIGNATURE
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)		
MAY 2015	1.50	
JUN 2015	2.50	
OCT 2015	2.00	
NOV 2015	83.00	
DEC 2015	8.50	
JAN 2016	5.00	
FEB 2016	4.00	
MAR 2016	10.50	
ATF OFFICER'S SUBTOTAL	117.00	ATF OFFICER'S SIGNATURE
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)		
NOV 2015	26.00	
ATF OFFICER'S SUBTOTAL	26.00	ATF OFFICER'S SIGNATURE
TOTAL HOURS	209.00	

13. REVIEW AND ROUTING	
REVIEW COMMENTS AND RECOMMENDATION Viols WC with WL and Recall	
<input checked="" type="checkbox"/> REVIEWED <input checked="" type="checkbox"/> CONCUR <input type="checkbox"/> SEE COMMENTS <input type="checkbox"/> FINAL DISPOSITION	
SIGNATURE AND TITLE (b)(6) Area Supervisor	REVIEW DATE 12/18/2015
REVIEW COMMENTS AND RECOMMENDATION A violation cited during the inspection warrants a recommendation of warning conference. I concur with this recommendation. Viols WC with WL and Recall	
<input checked="" type="checkbox"/> REVIEWED <input checked="" type="checkbox"/> CONCUR <input checked="" type="checkbox"/> SEE COMMENTS <input checked="" type="checkbox"/> FINAL DISPOSITION	
SIGNATURE AND TITLE (b)(6) Director, Industry Operations	REVIEW DATE 02/11/2016

ROUTING SEQUENCE AND DATE	
<input type="checkbox"/> 1. _____	CONTROL FILE POSTED DATE _____
<input type="checkbox"/> 2. _____	
<input type="checkbox"/> 3. _____	
<input type="checkbox"/> 4. _____	

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 Academy, LTD Academy Sports + Outdoors #47	Street Address 2643 NW Loop #10	City San Antonio	State TX	Zip Code 78230-	County Bexar	Page 1 of 3 Pages
License/Permit/Registry Number (If any) 574029016M01843		Expiration Date 12/1/2016		Date(s) or Period of Inspection 11/03/2015 through 01/26/2016		

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:

27 CFR 478.124(c)(5)- Failure to sign and/or date the ATF Form 4473 when the licensee does not know or have reasonable cause to believe that the transferee is disqualified by law from receiving the firearm (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

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)

In the future, the licensee is to ensure to sign and/or date the ATF Form 4473 when the transferee is not disqualified from receiving a firearm.

Number: 2

Nature of Violation:

27 CFR 478.124(c)(4)- Failure to correctly identify the firearm to be transferred by listing the correct serial number of the firearm on the ATF Form 4473 (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

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)

In the future, the licensee is to ensure the correct firearm identification is listed on the ATF Form 4473.

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 Academy, LTD Academy Sports + Outdoors #47	Street Address 2643 NW Loop 410	City San Antonio	State TX	Zip Code 78230-	County Bexar	Page 2 of 3 Pages
License/Permit/Registry Number (If any) 574029016M01843		Expiration Date 12/1/2016	Date(s) or Period of Inspection 11/03/2015 through 01/26/2016			

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:

27 CFR 478.124(c)(1)- Failure to obtain a properly completed ATF Form 4473, Section A, prior to making an over-the-counter transfer of a firearm to a non-licensee, who is a resident of the State in which the licensee's premises are located (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

In the future, the licensee is to ensure to obtain a properly completed ATF Form 4473, Section A, prior to the transfer of a firearm to a non-licensee.

Citation: 27 CFR 478.124(c)(1)

Number: 4

Nature of Violation:

27 CFR 478.102(a)- Failure to obtain a valid exception to NICS prior to transferring a firearm to a non-licensee (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

In the future, the licensee is to obtain a valid exception to NICS or conduct a NICS check prior to the transfer of a firearm to a non-licensee.

Citation: 27 CFR 478.102(a)

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 Academy, LTD Academy Sports + Outdoors #47	Street Address 2643 NW Loop 410	City San Antonio	State TX	Zip Code 78230-	County Bexar	Page 3 of 3 Pages
License/Permit/Registry Number (If any) 574029016M01843	Expiration Date 12/1/2016	Date(s) or Period of Inspection 11/03/2015 through 01/26/2016				

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:

27 CFR 478.124(a)- Failure to record the transaction on a firearm ^{(b)(3) - 112 (b)(3)} transaction record, ATF Form 4473, at the time of the transfer of a firearm to a non-licensee ^{(b)(3) - 112 (b)(3)} forms).

See attached

Citation: 27 CFR 478.124(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

In the future, the licensee is to ensure to record a firearms transaction on the ATF Form 4473 prior to the transfer of a firearm to a non-licensee.

Number: 6

Nature of Violation:

27 CFR 478.125(e)- Failure to record a disposition to the correct non-licensee in the Acquisition and Disposition record at the time of the trans ^{(b)(3) - 112 (b)(3)} instances).

See attached

Citation: 27 CFR 478.125(e)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

In the future, the licensee is to record the correct disposition information for a non-licensee in the Acquisition and Disposition record.

I Have Received

Signature and Title of ATF Officer

SR MANAGER COMPLIANCE

IOI

Date

03-17-2016

Date

3/17/2016

For Official Use Only

ATF E-Form 3030.5

Revised April 2005

FIREARMS INSPECTION REPORT

Name: Academy, LTD
Trade Name: Academy Sports + Outdoors #47

UI#: 782065-2015-0463-B1B
FFL#: 5-74-029-01-6M-01843

Address: 2643 NW Loop 410
San Antonio, Texas 78230

1 - Introduction

Inspection Profile:

On November 3 through 6, 13, 18 and 24, 2015, Industry Operations Investigators (IOI) (b)(6) Investigator (SI) (b)(6) conducted an on-site compliance inspection for Academy, LTD d.b.a. Academy Sports + Outdoors #47 (hereafter referred to as Academy #47). On November 24, 2015, and January 26, 2016, IOI (b)(6) reconciled ATF Forms 4473 regarding raffle transactions conducted in 2013 and 2014 (discussed below). The premises are located at 2643 Northwest Loop 410, San Antonio, Texas 78230. IOI (b)(6) interviewed Mr. Jeremy Michael Woodward, Store Director and Responsible Person, who was identified by his Texas Driver License. No other Federal, State or local agencies participated in the inspection.

Prior to the inspection, a "Voluntary Self-disclosure Concerning Firearms Raffle Recordkeeping at Academy's Vance Jackson Store, #47" was provided to (b)(6) ATF Director of Industry Operations, Houston Field Division, by (b)(6) Attorneys at Law. IOI (b)(6) lead investigator for the inspection, was provided a printed copy of the disclosure (EXHIBIT 1). Because of the time period reflected by the disclosure, the inspection period was expanded to cover January 13, 2012 to November 3, 2015. There were no suspicious purchasers or traffickers discovered during the inspection and no missing firearms during the inventory check. There were six violations cited: 27 CFR 478.124(c)(5), 27 CFR 478.124(c)(4), 27 CFR 478.124(c)(1), 27 CFR 478.102(a), 27 CFR 478.124(a) and 27 CFR 478.125(e).

A warning conference was held on March 9, 2016 at the ATF Houston Field Division Office, 5825 North Sam Houston Parkway West, Suite 300, Houston, Texas, 77806. In attendance representing Academy, LTD were (b)(6) (Senior Director-Compliance) (b)(6) (Senior Manager-Compliance) (b)(6) (Associate General Counsel Labor and Employment) (b)(6) (District Manager), and (b)(6) (Store Director). Also in attendance for ATF were Director of Industry Operations (b)(6) Area Supervisor (b)(6) and IOI (b)(6). During the inspection, a violation was cited for 27 CFR 478.124(c)(3)(i), which was rescinded after the warning conference. A revised ATF E-Form 5030.5 Report of Violations was sent via email to (b)(6) for a signature on March 17, 2016.

FIREARMS INSPECTION REPORT

Name: Academy, LTD
Trade Name: Academy Sports + Outdoors #47

UI#: 782065-2015-0463-B1B
FFL#: 5-74-029-01-6M-01843

Business Profile:

Academy, LTD is operating using the assumed name, Academy Sports + Outdoors #47. Academy #47 is a sporting goods store which sells athletic apparel, indoor and outdoor sporting goods, and accessories. The store is located in a commercially-zoned building and there are no zoning restrictions. IOI (b)(6) contacted the San Antonio Development Services office by telephone and spoke to (b)(6) Senior Planner. (b)(6) stated the building is zoned C-3 for commercial use. IOI (b)(6) queried the Bexar County Appraisal District website which reflected Academy Sports as the owner (**EXHIBIT 2**). The store operates Monday through Thursday, 8:30 a.m. to 9:30 p.m., Friday 8:30 a.m. to 10:00 p.m., Saturdays 8:00 a.m. to 10:00 p.m. and Sundays 9:30 a.m. to 9:30 p.m. The store is not open on Thanksgiving or Christmas day.

The firearms are sold in the outdoors section of the store. The store also sells cleaning kits, gun cases, optics, ammunition and other various firearms-related accessories. Academy #47 is part of a sporting goods chain that holds other Federal Firearms Licenses (FFLs) at various locations in the southern United States. Firearms are advertised on the company website at www.academy.com but orders can only be transferred at the stores. Firearms are also advertised in weekly advertisements. There are no sales of firearms conducted at gun shows.

During the inspection period from January 13, 2012 to November 3, 2015, the total number of firearms acquired were (b)(4) and (b)(4) were disposed. The firearms are sold at (b)(4) percent retail. Academy #47 deals in (b)(4) percent new firearms and (b)(4) percent used firearms with handguns and long guns accounting for an equal portion of the business. The store receives new firearms from the (b)(4) which also holds an FFL. The store offers brands such as Mossberg, Taurus, Remington, Smith and Wesson, Glock, and others. The used firearms are acquired through internet transfers conducted on a limited basis as a service to the customers. Academy #47 does not offer repair services and does not conduct business at gun shows. There is no off-site storage of firearms.

The long guns for sale are housed in lockable display racks behind the firearms sales counter. The overflow inventory of long guns is stored in locked cages below the display racks. The handguns for sale are displayed in lockable glass cases during operating hours and are returned to one of three gun safes behind the sales counter during hours the store is closed. The overflow inventory of handguns is also stored in the gun safes.

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The premises are protected by an alarm system monitored by Transalarm, which features contact and motion sensors. The front entrance consists of two sets of glass doors which are lockable. There are five fire exits throughout the building which provide no access from the outside. All fire exits remain locked unless a spring loaded bar is pushed. In the rear, there are three roll-up doors that are accessed for loading inventory. The roll-up doors have contact sensors and are lockable by using a lock on the chain used to raise and lower the door. There are approximately 30 cameras throughout the store to include outdoor cameras and cameras aimed at the gun safes in the firearms retail area. The cameras are connected to a digital video recorder at the premises. The main office in Katy, Texas also has access to the footage. There are also undercover employees who randomly patrol the store for shoplifters an average of twice a week.

The following was verified by IO (b)(6) at the premises:

- Original FFL
- Texas Sales and Use Tax Permit (b)(3) - 26 USC 6103
- City of San Antonio Certificate of Occupancy #894663
- City of San Antonio Police Department Alarm Permit #040998

There are no other ATF licenses held at this location.

Ownership and Control:

All ownership and entity paperwork related to Academy, LTD d.b.a. Academy Sports + Outdoors #47 is maintained at the Federal Firearm Licensing Center (RDS Key 5-76-0004) and is not kept at the store level. IO (b)(6) queried the Texas Secretary of State website and obtained a printout of the Articles of Conversion of Academy Corp. into Academy LTD and a copy of the Assumed Name Certificate which is reflected as being valid in all counties until February 2022 (EXHIBIT 3). Pe (b)(6) ATF Senior Attorney, assumed names do not need to be registered for entities which contain the name as part of the assumed name.

The Texas Secretary of State website reflects Academy Managing Co., LLC as the General Partner. IO (b)(6) queried the website for Academy Managing Co., LLC which reflected the following Management Members who are also Responsible Persons listed by the Federal Licensing System (FLS) printout for Academy LTD (RDS Key 5-76-00004) dated November 25, 2015: Mr. Rodney Faldyn (President & CEO), Mr. Ken Attaway (Executive Vice President-Operations), Mr. Michael Amett (Executive Vice President and Chief Financial Officer) and Mr. Wade Turner (General Counsel). IO (b)(6) queried the Texas Comptroller office and obtained a printout reflecting the tax account is

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Name: Academy, LTD
Trade Name: Academy Sports + Outdoors #47

UI#: 782065-2015-0463-B1B
FFL#: 5-74-029-01-6M-01843

“active” (EXHIBIT 4). The website reflected the Officer/Directors who are discussed above.

The FLS printout dated May 11, 2015, for the premises FFL reflects (b)(6) (b)(6) is the only Responsible Person at the store level for this FFL. No changes to the Responsible Persons were made during the inspection. There are no signs of hidden ownership.

Variance:

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

2 - Recommendation

Violations, Warning Conference with Warning Letter, and Recall Inspection

3 - Inspection History

Date of Inspection: January 12, 2012
Type of Inspection: Compliance inspection
UI#: 782065-2012-0153-B1B
Inspection Results: No Viols No Further Action Referrals Made
Cited Violations: None

Date of Inspection: June 17, 2009
Type of Inspection: GRIT Project inspection
UI#: 782065-2009-0571-G1C
Inspection Results: No Viols No Further Action No Referrals
Cited Violations: None

FIREARMS INSPECTION REPORT

Name: Academy, LTD
Trade Name: Academy Sports + Outdoors #47

UI#: 782065-2015-0463-B1B
FFL#: 5-74-029-01-6M-01843

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

IO (b)(6) conducted a 100 percent inventory and there were 1,036 firearms in inventory and open entries in the Acquisition and Disposition (A&D) computerized record. IO (b)(6) verified the gun numbers, descriptions, and serial numbers from the firearms to the computerized A&D record and there were no discrepancies.

Academy #47 utilizes proprietary software for the A&D records, which are backed up nightly on a computer server owned by Academy, LTD at the store. The main office in Katy, Texas also has access to the records. All information reflected by the A&D record is in the proper format.

When the firearms are shipped from the Academy Distribution Center, the handguns are housed in plastic totes which have security seals at each end. The long guns are covered with shrink wrap on pallets. Upon reaching the store, the firearms are removed first from the truck. The firearms are physically compared to a manifest from the main office to ensure all firearms are accounted for. Once the manifest is balanced against the firearms, the firearms are acquired into the store's A&D record. There are currently 14 employees certified to handle the firearms. Once in the store, a gun count is conducted twice a day, once in the morning and once in the afternoon. A complete inventory is conducted each month in which the physical firearm identification information, to include the serial number, is compared to the A&D record. There were no obliterated serial numbers found during the inspection of the inventory.

During a review of the A&D records, a violation was issued for 27 CFR 478.125(e) for failure to record the disposition of a firearm to the correct non-licensee at the time of the transfer of the firearm (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

returned to the store (discussed below). IO (b)(6) contacted (b)(6) Senior Manager of Compliance for Academy, LTD, who provided an example of the


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audit trail when an A&D record is changed (**EXHIBIT 6**). The disposition dates were recorded as when the raffle winners originally came to the store in 2013 to redeem the firearms. The disposition dates were determined from copies of electronic NICS check printouts and an internal list of the winners maintained at Academy #47 (**EXHIBIT 7**).

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)



(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)



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(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

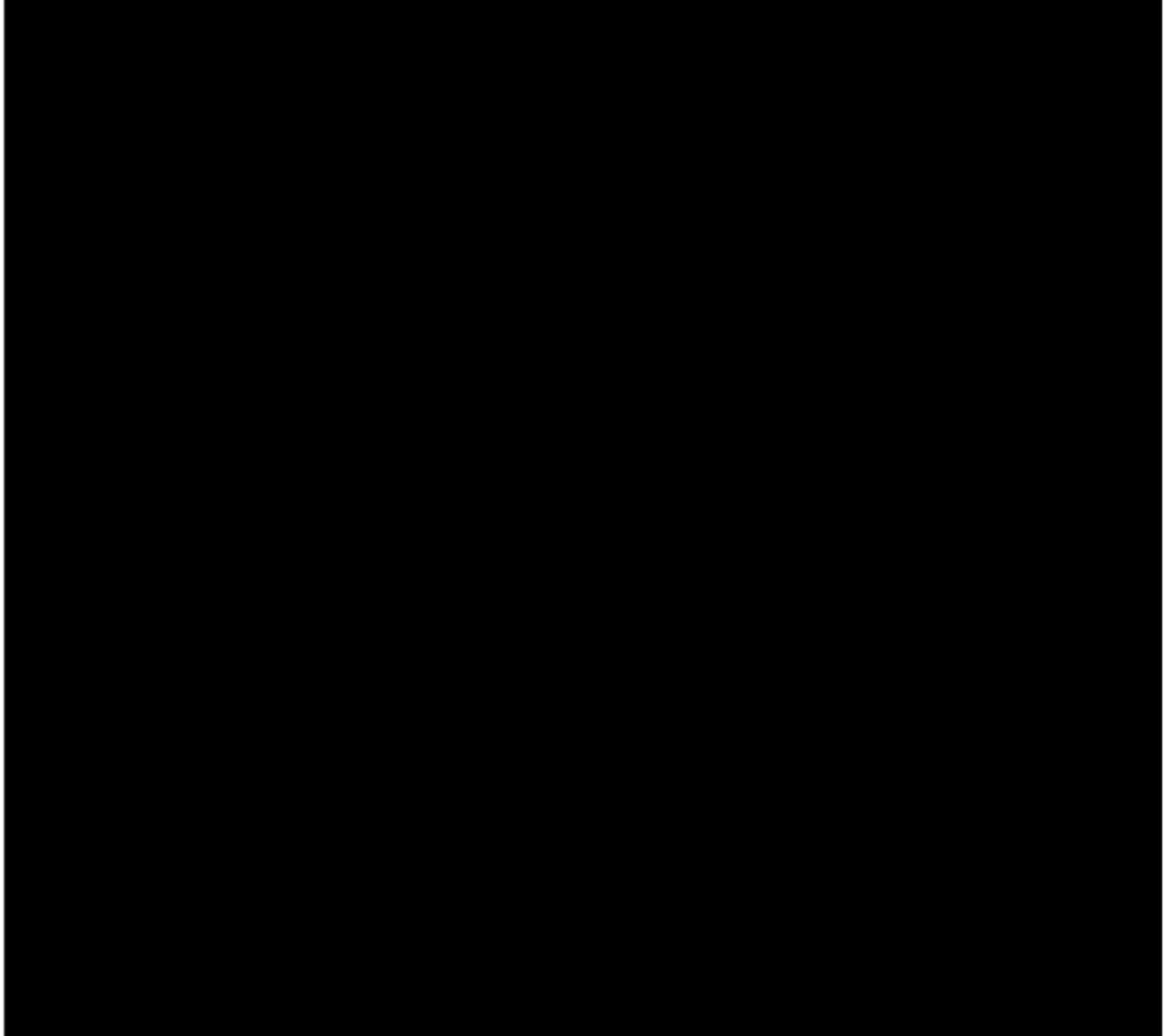


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(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)



Academy #47 was cited a violation for 27 CFR 478.125(e) for failure to record a disposition to the correct non-licensee in the A&D record at the time of the transfer.

There was (b)(3) - 112 Public Law 55 125 Stat 552 (b)(6) provided IOI (b)(6) with a copy of the ATF E-Form 3310.11, Federal Firearms Licensee Firearms Inventory Theft/Loss Report reflecting the ATF Issued Incident Number, F20140001774 (EXHIBIT 9) (b)(6) (b)(6) stated the shotgun, which was part of the 2013 raffle discussed above, could not be located in inventory and a search of a corresponding ATF Form 4473 was met with negative results. (b)(6) stated an ATF Form 4473 was not completed at the time of the transfer. (b)(6) was trying to contact the winner

(b)(6)

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REFERENCE: ROV, Worksheet 1, and EXHIBITS 1, 5, 6, 7, and 8

5 - ATF Forms 4473 – NICS & Other Dispositions

There were a total of (b)(3) - 112 Public Law 55 125 Stat 552 2008 edition and (b)(3) - 112 Public Law 55 125 Stat 552 2012 edition) ATF Forms 4473 on file and reviewed for the inspection period of January 13, 2012 to November 3, 2015. There were violations cited as discussed below. Any qualified employee who completes the firearms training modules are able to initiate a firearms transaction. Prior to beginning any paperwork for the firearms transaction, the employee asks for identification and checks to ensure the identification is valid and confirms the address reflected by the identification document is current. If all information is valid, the customer is given a packet which includes the ATF Form 4473 as well as information regarding returns.

Once the customer completes Section A of the ATF Form 4473, the employee completes the rest of the form to include conducting a National Instant Criminal Background Check System (NICS) check, if applicable. Academy #47 utilizes the electronic NICS system and prints out the NICS result and attaches it to the ATF Form 4473. The identifying information of the firearm(s) recorded on the ATF Form 4473 is obtained from the physical firearm(s) by the employee. Once the ATF Form 4473 is completed, a manager is called to double-check the transaction form. If all information is correct and complete on the ATF Form 4473, a qualified employee escorts the customer and the firearm to the cashier. Once payment is completed by the customer, the employee walks the firearm to the door and delivers it to the customer. The ATF Forms 4473 are filed chronologically following a completed transaction and are divided by handguns and long guns in separate folders. The denied transactions are filed in separate folders by year. The ATF Forms are checked twice at the time of the purchase and then again weekly during internal audits. An internal review sheet for the ATF Forms 4473 is used by managers to check the accuracy of the records.

The FFL Audit Report dated October 7, 2015, was compared against the ATF Forms 4473. There were (b)(3) - 112 Public Law 55 125 Stat 552 transactions (b)(3) - 112 Public Law 55 125 Stat 552 from October 1, 2012 to October 7, 2015, reflected by the report. Of the (b)(3) - 112 Public Law 55 125 Stat 552 transactions, there were (b)(3) - 112 Public Law 55 125 Stat 552 cancelled, and (b)(3) - 112 Public Law 55 125 Stat 552 denied transactions (last five years) verified by the investigators. There were no trafficking issues found relating to the acquisition and disposition of firearms.

Following a review of the ATF Forms 4473, the following six violations were cited:

- 27 CFR 478.124(a)- Failure to record the transaction on a firearms transaction record, ATF Form 4473, at the time of the transfer of a firearm to a non-licensee (b)(3) - 112 Public Law 55 125 Stat 552 forms). The transactions involve (b)(3) - 112 Public Law 55 125 Stat 552 firearms.

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Name: Academy, LTD

UI#: 782065-2015-0463-B1B

Trade Name: Academy Sports + Outdoors #47

FEL#: 5-74-029-01-6M-01843

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)



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Name: Academy, LTD
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UI#: 782065-2015-0463-B1B
FFL#: 5-74-029-01-6M-01843

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)



See EXHIBITS 5, 7, and 8

The transactions listed above involved firearms for a 2013 St. Luke's raffle in San Antonio, Texas, between the representative (b)(6) discussed above), and Academy #47. (b)(6) was the Store Director for Academy #47 during that time and was responsible for the transaction. (b)(6)

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)



(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)
For the customers who were qualified, the firearms were released without the completion of an ATF Form 4473. (b)(6) provided IOI (b)(6) with a copy of the list of the winners and copies of the NICS results printouts (See EXHIBIT 7).

(b)(6) became the Director of Academy #47 in June 2014. During his acclamation with the store (b)(6) stated he noticed some problems with the completion of the ATF Forms 4473 and decided to do an audit. (b)(6) brought over (b)(6) who was an Academy auditor at another store, to assist with the audit. During the initial audit, which was expanded back to 2013, it was discovered that certain firearms were not matching up between the A&D record and the ATF Forms 4473 for the raffle transactions in 2013. (b)(6) stated he alerted (b)(6)

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(b)(6) Senior Manager of Compliance, at the main office and a team of company auditors was sent to the store. During the audit, it was discovered that no ATF Forms 4473 had been completed for the 2013 raffle winners except for the original ATF Form 4473 reflecting (b)(6) as the only transferee. As discussed above, (b)(6) had two of the original 43 firearms transferred to him for his personal collection and they were reflected by the ATF 4473 he initially completed for the raffle. (b)(6)

(b)(6) was contacted during the audit and went to the store in approximately August 2014, where (b)(6) asked (b)(6) about the firearms that were transferred to him. (b)(6) indicated they were transferred to him for his personal collection and he later sold them to an acquaintance. (b)(6) stated Academy #47 did not have any participation regarding the transfer of firearms between (b)(6) and (b)(6).

(b)(6) and the audit team constructed a database of the winners, which was provided to IO (b)(6) EXHIBIT 10. (b)(6) and employees began contacting the winners and offered a gift card to return to the store to complete an ATF Form 4473 for their firearms. Of the 36 raffle winners, 17 returned to the store and completed an ATF Form 4473 for a total of 17 firearms. IO (b)(6) and SI (b)(6) discovered ATF Forms 4473 regarding the raffle during the review. A total of 19 winners did not respond to the offer involving firearms. Of the 17 who returned to the store, seven of the winners brought in the firearms, which were logged into the A&D record on that day. An ATF Form and NICS check was completed for each customer that did not possess a valid Texas Conceal Handgun License as an exemption to the NICS check. The customers were not prohibited and their firearms were returned to them and logged out of the A&D record on that day (EXHIBIT 11). For the other ten customers who returned, they filled out an ATF Form 4473 and Item 17 of the form reflected the current day the customer was in the store. The NICS check, if applicable, and Item 36 reflected the original transfer date in 2013 (EXHIBIT 12). A brief explanation of the transaction was notated in Item 30C of the ATF Form 4473 along with an explanation sheet (EXHIBIT 13).

- 27 CFR 478.124(c)(5)- Failure to sign and/or date the ATF Form 4473 when the licensee does not know or have reasonable cause to believe that the transferee is disqualified by law from receiving the firearms (forms).

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

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Trade Name: Academy Sports + Outdoors #47

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- 27 CFR 478.124(c)(4)- Failure to correctly identify the firearm to be transferred by listing the correct serial number of the firearm on the ATF Form 4473 (form)

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

See EXHIBIT 15

- 27 CFR 478.124(c)(1)- Failure to obtain a properly completed ATF Form 4473, Section A, prior to making an over-the-counter transfer of a firearm to a non-licensee who is a resident of the State in which the licensee's premises are located (arms)

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

See EXHIBIT 16

- 27 CFR 478.102(a)- Failure to obtain a valid exception to NICS prior to transferring a firearm to a non-licensee (form).

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

IO (b)(6) conducted a background check in the OpenFox database using the customer's identifiers for this violation and there were no hits.

See EXHIBIT 17

REFERENCE: ROV, Worksheet 2, and EXHIBITs 1, 5, 7, 8, and 14-17

6 - Multiple Sales

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

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There were no violations found.

7 - Suspicious/Prohibited Purchases

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

8 - Trace Activity

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

9 - NFA/Importer/Collector/Manufacturer

Academy #47 does not deal in National Firearms Act firearms and does not import firearms at this premises. Academy #47 is not a collector and does not manufacture firearms.

10 - Referrals

There were no referrals generated as a result of the inspection.

11 - Other

The Youth Handgun Safety poster is displayed and the notices were available at the counter. (b)(6) stated each employee who works with firearms must go through online and hands on training. (b)(6) stated he attended an ATF seminar in San Antonio, Texas in approximately 2011.

12 - Closing Actions

A closing conference was held on November 24, 2015, and IO (b)(6) reviewed the Acknowledgement of Federal Firearms Regulations and Report of Violations (ROV).

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Trade Name: Academy Sports + Outdoors #47

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ATF E-Form 5030.5 with (b)(6) Both signed the acknowledgement and ROV on that day and (b)(6) was provided a copy of both (EXHIBIT 18).

The following topics were also discussed in length: inventory requirements; NICS requirements; A&D book; multiple sale reports for both handguns and long guns; sales to non-immigrant and resident aliens; sales to military and police; internet sales; transfers to out-of-state residents; transfers to other FFLs; ATF Form 4473; straw purchases and gun locks.

IO (b)(6) also provide (b)(6) with the following materials:

- ATF Form 3310.4 Report of Multiple Sale or Other Disposition of Pistols and Revolvers (in the event the store begins selling firearms)
- ATF Form 3310.11 Federal Firearms Licensee Firearms Inventory Theft/Loss Report
- ATF Publication 5300.15 Federal Firearms Licensee Quick Reference and Best Practices Guide
- ATF Information 5300.2 Youth Handgun Safety Act Notice
- ATF I 5300.1 Youth Handgun Safety Act Poster
- Contact information for applicable ATF Offices

IO (b)(6) also reviewed the notice regarding selling firearms after revocation, expiration or surrender of an FFL (b)(6) signed and dated the notice and was provided a copy of the notice (EXHIBIT 19). IO (b)(6) informed (b)(6) that the 2014 Federal Firearms Regulations are available for download at www.atf.gov or the option to purchase a hard copy.

The Federal Licensing System printout reflects (b)(3) - 112 Public Law 55 125 Stat 552 requirement. On May 14, 2015, IO (b)(6) contacted (b)(6) ATF Industry Operations Specialist regarding the reporting requirements of traced firearms for this licensee (b)(6) stated Academy Sports is not required to file a report regarding the (b)(3) - 112 Public Law 55 125 Stat 552

13 - Violations

1. 27 CFR 478.124(c)(5)

Nature of violation:

Failure to sign and/or date the ATF Form 4473 when the licensee does not know or have reasonable cause to believe that the transferee is disqualified by law from receiving the firearm (b)(3) - 112 Public Law 55 125 Stat 552 (forms).

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

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(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

(b)(6) stated the "only thing I can think of is the associate didn't take time to complete the responsibilities" regarding the completion of the ATF Forms 4473. (b)(6) stated the ATF Forms 4473 are supposed to be checked for accuracy and completeness by the associate initiating the transfer and a manager prior to the transfer.

Corrective action:

In the future, the licensee is to ensure to sign and/or date the ATF Form 4473 when the transferee is not disqualified from receiving a firearm.

Reference: ROV, Worksheet 2, and EXHIBIT 14

2. 27 CFR 478.124(c)(4)

Nature of violation:

Failure to correctly identify the firearm to be transferred by listing the correct serial number of the firearm on the ATF Form 4473 (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6).

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

(b)(6) stated the "associate failed to follow through" in regards to recording the serial number on the ATF Form 4473. (b)(6) also stated it was missed during the second check by the manager and (b)(6) will discuss the errors with his employees.

Corrective action:

In the future, the licensee is to ensure the correct firearm identification is listed on the ATF Form 4473. IOI (b)(6) obtained a copy of the ATF Form 4473 reflecting the correct serial number (b)(6) for Item #28.

Reference: ROV, Worksheet 2, and EXHIBIT 15

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

Nature of violation:

Failure to obtain a properly completed ATF Form 4473, Section A, prior to making an over-the-counter transfer of a firearm to a non-licensee, who is a resident of the State in which the licensee's premises are located (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6).

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

(b)(6) stated "our associate and our manager didn't catch it" regarding the errors in Section A. As with the other violations, (b)(6) will discuss the errors with his employees.

Corrective action:

In the future, the licensee is to ensure to obtain a properly completed ATF Form 4473, Section A, prior to the transfer of a firearm to a non-licensee.

Reference: ROV, Worksheet 2, and EXHIBIT 16

4. **27 CFR 478.102(a)**

Nature of violation:

Failure to obtain a valid exception to NICS prior to transferring a firearm to a non-licensee (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6).

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

(b)(6) stated "they accepted the wrong documentation" in regards to the employee who completed the ATF Form 4473. (b)(6) stated he was not employed at the store at the time of the transaction. (b)(6) also stated he is aware only a valid Texas Concealed Handgun License can be accepted as an exception to a NICS check.

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Corrective action:

In the future, the licensee is to obtain a valid exception to NICS or conduct a NICS check prior to the transfer of a firearm to a non-licensee.

Reference: ROV, Worksheet 2, and EXHIBIT 17

5. 27 CFR 478.124(a)

Nature of violation:

Failure to record the transaction on a firearms transaction record, ATF Form 4473, at the time of the transfer of a firearm to a non-licensee (b)(3) - (12) Public (forms).

Licensee's response:

As with the A&D record violation (b)(6) stated "internal procedures were not followed by (b)(6) who was the Store Director during the transaction which involved firearms used in raffle. (b)(6) stated there are procedures in place for Academy stores who help facilitate raffle transfers. (b)(6) stated the winners do not complete any paperwork at the raffles and must return to the store to complete the ATF Form 4473 and NICS check, if applicable, prior to the transfer of a firearm won at the raffle.

Corrective action:

In the future, the licensee is to ensure to record a firearms transaction on the ATF Form 4473 prior to the transfer of a firearm to a non-licensee.

Reference: ROV, Worksheet 2 and EXHIBITS 1, 5, 7, and 8

6. 27 CFR 478.125(e)

Nature of violation:

Failure to record a disposition to the correct non-licensee in the A&D record at the time of the transfer (b)(3) - (12) Public (instances).

Licensee's response:

(b)(6) stated he was not employed at Academy #47 during the period of the violation and "internal procedures were not followed by (b)(6) who was the Store Director during the transactions which involved firearms used in raffle (b)(6)

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(b)(6) stated there are procedures in place for Academy stores who help facilitate raffle transfers in which no firearms are logged out until the winner of the firearm comes to the store to redeem the firearm. (b)(6) explained that raffle winners are awarded gift cards in the amount of the firearms that are won. The winner goes to the store to complete an ATF Form 4473 and NICS check, if applicable, before the firearm is transferred to them. The payment for the firearm is made with the gift card. (b)(6) stated the firearm is recorded as a disposition at the completion of the transfer to the winner just like any other firearms transaction.

Corrective action:

In the future, the licensee is to record the correct disposition information for a non-licensee in the Acquisition and Disposition record. IO (b)(6) verified all corrections to the A & D record except those firearms with an asterisk on pages six and seven (2013 raffle).

Reference: ROV, Worksheet 1 and EXHIBITS 1, 5, 7, and 8

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FFL#: 5-74-029-01-6M-01843

X

Industry Operations Investigator

Index of Worksheets and Exhibits

ATF E-FORM 5030.5- Report of Violations

WORKSHEETS

EXHIBIT 1 Voluntary Self-Disclosure printout

EXHIBIT 2 Bexar County Appraisal District website printout

EXHIBIT 3 Texas Secretary of State website printout

EXHIBIT 4 Texas Comptroller office website printout

EXHIBIT 5 (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

EXHIBIT 6 Computerized A&D record audit example

EXHIBIT 7 NICS printouts and winners list for 2013 raffle

EXHIBIT 8 (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

EXHIBIT 9

EXHIBIT 10 2013 raffle winners list printout

EXHIBIT 11 (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

EXHIBIT 12

EXHIBIT 13 Item 30C explanation sheet

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Name: Academy, LTD
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FFL#: 5-74-029-01-6M-01843

- EXHIBIT 14** (b)(3) - 112 Public Law 55 125 Stat 552
- EXHIBIT 15**
- EXHIBIT 16**
- EXHIBIT 17**
- EXHIBIT 18** Acknowledgement of Federal Firearms Regulations
- EXHIBIT 19** Important Notice



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

8610 Broadway, Suite 410
San Antonio, Texas 78217

February 19, 2016

www.atf.gov

782065:EI (b)(6)
5373

WARNING CONFERENCE

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Academy, LTD
D.b.a. Academy Sports + Outdoors (#47)
ATTN: (b)(6)
1540 North Mason Road
Katy, TX 77449

REF: FFL# 5-74-029-01-6M-01843

Dear (b)(6)

During a recent compliance inspection at your firearms business covering the period January 13, 2012, to November 3, 2015, you were cited for violations of Title 27, Code of Federal Regulations, Part 478. The violations were discussed with you or your designated responsible person during the inspection.

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 **March 9, 2016, at 11:00 A.M., at the Bureau of ATF, 5825 North Sam Houston Parkway West, Suite 300, Houston, Texas 77806.** 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 with you any documentation verifying the corrective action you have taken.

Academy, LTD
D.b.a. Academy Sports + Outdoors (#47)
ATTN: (b)(6)

REF: FFL# 5-74-029-01-6M-01843

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.

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 Area Supervisor (b)(6) or IO (b)(6) to confirm this appointment and to ask any questions you may have regarding this conference. We look forward to meeting with you to resolve these issues.

Sincerely yours,

(b)(6)

Area Supervisor
San Antonio Group II

cc: Federal Firearms Licensing Center
San Antonio Group II



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
8610 Broadway, Suite 410
San Antonio, Texas 78217

March 10, 2016

www.atf.gov

782065:EF(b)(6)
5373

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

(b)(6)

Academy, LTD
D.b.a. Academy Sports + Outdoors (#47)
1540 North Mason Road
Katy, TX 77449

REF: FFL # 5-74-029-01-6M-01843

Dear (b)(6)

This letter is a follow-up to the Warning Conference held with representatives of Academy, LTD on March 9, 2016 at the ATF Houston Field Division Office, 5825 North Sam Houston Parkway West, Suite 300, Houston, Texas, 77806. In attendance representing Academy, LTD were (b)(6) (b)(6) Senior Director-Compliance (b)(6) Senior Manager-Compliance (b)(6) (b)(6) Associate General Counsel Labor and Employment (b)(6) District Manager, and (b)(6) (Store Director). Also in attendance for ATF were Director of Industry Operations (b)(6) Area Supervisor (b)(6) and Industry Operations Investigator (IOI) (b)(6). During this conference, the violations cited during the inspection covering the period of January 13, 2012, to November 3, 2015, and the necessary corrective actions to prevent the violations from reoccurring were discussed. The representatives of Academy, LTD were given the opportunity to comment on the violations and what specific actions will be taken to ensure that the violations will not reoccur.

Regarding the ATF Form 4473 violation, 27 CFR 478.124(c)(5), Academy, LTD employee(s) failed to sign and/or date the ATF Form 4473 when the licensee does not know or have reasonable cause to believe that the transferee is disqualified by law from receiving the firearm.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)
(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)
(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

The representatives of Academy, LTD stated it was uncertain why Item 34 was not completed correctly. It was also speculated that the transaction occurred right after Christmas and may have been missed. In regards to Item 36, it was stated the ATF Form was filed without entering a date on Item 36 and the "internal audit didn't catch" the error. The representatives of Academy, LTD explained an ATF Form 4473 overlay is used as a tool to check the ATF Forms 4473 for accuracy and the employee checking the forms discussed above may have not used the overlay. The representatives of Academy, LTD stated it will be reiterated to the employees to check the ATF Forms 4473 for completeness and accuracy and use the ATF Form 4473 overlay.

Academy, LTD
D.b.a. Academy Sports + Outdoors (#47)
ATTN: (b)(6)

REF: FFL # 5-74-029-01-6M-01843

Regarding the ATF Form violation, 27 CFR 478.124(c)(4), Academy, LTD employee(s) failed to correctly identify the firearm to be transferred by listing the correct serial number of the firearm on the ATF Form 4473 (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

(b)(3) - 112 Public Law 55 125 Stat 552 The representatives of Academy, LTD were uncertain as to why the correct serial number was not entered on the ATF Form 4473. As with the previous violation, Academy, LTD will remind employees to use the ATF Form 4473 overlay when checking the forms and there will be daily, weekly, and monthly audits of the ATF Forms 4473.

Regarding the ATF Form violation, 27 CFR 478.124(c)(1), Academy, LTD employee(s) failed to obtain a properly completed ATF Form 4473, Section A, prior to making an over-the-counter transfer of a firearm to a non-licensee, who is a resident of the State in which the licensee's premises are located (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) As with the other violations discussed above, the representatives of Academy, LTD were uncertain as to why the errors were not discovered by an employee during the internal checks. The employees will be instructed to use the ATF Form 4473 overlay and to conduct internal audits of the ATF Forms 4473 on a daily, weekly, and monthly basis.

Regarding the ATF Form violation, 27 CFR 478.124(c)(3)(i), Academy, LTD failed to obtain the correct identification information and notate the information on the ATF Form 4473 (b)(3) - 112 Public Law 55 125 Stat 552

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

(b)(3) - 112 Public Law 55 125 Stat 552 The representatives of Academy, LTD now understand the requirement and were instructed to inform their employees.

Academy, LTD
D.b.a. Academy Sports + Outdoors (#47)
ATTN: (b)(6)

REF: FFL # 5-74-029-01-6M-01843

Regarding the ATF Form 4473 violation, 27 CFR 478.102(a), Academy, LTD employee(s) failed to obtain a valid exception to NICS prior to transferring a firearm to a non-licensed (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)
(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) representatives of Academy, LTD stated a checklist used to review the ATF Forms 4473 has been updated since 2012 to instruct employees to only accept a NICS exemption from the State where the firearms transfer is occurring.

Regarding the ATF Form 4473 violation, 27 CFR 478.124(a), Academy, LTD employee(s) failed to record the transaction on a firearms transaction record, ATF Form 4473, at the time of the transfer of a firearm to a non-licensed (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) (b)(6) explained the violation involved transactions in which customers who won firearms in a raffle in 2013 went to Academy Sports + Outdoor #47 to redeem their firearms and a NICS check was performed for each customer but no ATF Form 4473 was executed prior to the transfer. The representatives of Academy, LTD stated the employees for the Academy Sports + Outdoor #47 store were confused about how to conduct transactions regarding a firearms raffle and Academy, LTD self-reported the violation to ATF. The representatives for Academy, LTD stated since 2014, the employee manual has been updated regarding procedures for transactions associated with raffles and approval to conduct transactions for raffles has to be sought from district managers, directors, and the Academy, LTD compliance group. The new procedure has been addressed at Store Director meetings. IOI (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

(b)(6) confirmed with the representatives for Academy, LTD that the raffle transaction procedure requires the representative for the raffle to purchase gift cards in the amounts of the firearms to be raffled. The firearms set aside for the raffle are in the possession of Academy, LTD employees before, during, and after the raffle. The raffle winners are to return to the Academy, LTD store to present their gift card, which can be used to purchase the firearm they won, put towards another firearm, or used for merchandise other than a firearm. If the gift card is redeemed for a firearm, an ATF Form 4473 and a NICS check, if applicable, is performed prior to the transfer of a firearm to the winner. If a firearm reserved for the raffle is not redeemed within two weeks, the firearm is returned to inventory for sale to the public.

Regarding the Acquisition and Disposition (A&D) record violation, 27 CFR 478.125(e), Academy, LTD employee(s) failed to record a disposition to the correct non-licensee in the A&D record at the time of the transfer (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) IOI (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) explained there were total firearms involving raffles held in 2013 and 2014 in which firearms were logged out to the representative of the raffle who did not physically take possession of the firearms. As with the previous violation, the representatives of Academy, LTD stated the employees handling the raffle transactions did not understand the process. As discussed with the previous violation, the procedures regarding raffle transactions have been updated and will be implemented at the stores.

Academy, LTD
D.b.a. Academy Sports + Outdoors (#47)
ATTN: (b)(6)

REF: FFL # 5-74-029-01-6M-0184

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

Please contact the San Antonio Area Office at (b)(3) - 112 Public Law 56 125 Stat 562 if you have any questions concerning your responsibilities as a licensee or if you require further clarification about particular requirements of Federal firearms laws.

Sincerely,

(b)(6)

San Antonio II Area Office
Houston Field Division

cc: Federal Firearms Licensing Center
San Antonio II Field Office