

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) MISSION CRITICAL FIREARMS LLC 48380 VAN DYKE AVE STE 400 SHELBY TOWNSHIP, MI 48317, MACOMB	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 774030-2018-0154-B1B		
	3. PERMIT/LICENSE NUMBER 438099078B06200	4a. TARGET DATE 9/30/2018	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, 01/08/2018

8. PURPOSE/SPECIAL INSTRUCTIONS

Please conduct a Disposition Emphasis compliance inspection, to include a complete inventory and review of all ATF Forms 4473 available for the inspection period. Verify ownership, responsible persons status, and contact information. Document each finding, and enter all required information into N-SPECT.

This assignment is issued in keeping with the FY2018 Domain Assessment as a "high risk" inspection based upon information received from Federal, State or local sources.

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	9	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS	7	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: 05/15/2018

On 2/22/18 a compliance inspection was initiated on Mission Critical Firearms LLC. The closing conference was held on 3/14/18. There were nine violations cited, to include failure to conduct a NICS check and obtain an ATF F 4473 for transfers to law enforcement officers. The letters obtained on Department letterhead did not meet the requirements of 27 CFR 478.134 for ATF F 4473 exemption. The violations could merit a warning letter; however, the licensee has been issued two warning letters and similar violations were cited during this inspection. A Warning Conference with Recall is recommended.

Viols WC with WL and Recall

12. TIME ACCOUNTING DATA

ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)
JAN 2018	3.50	
FEB 2018	18.00	
MAR 2018	20.00	
APR 2018	2.00	
MAY 2018	4.00	
JUN 2018	2.00	
ATF OFFICER'S SUBTOTAL	49.50	ATF OFFICER'S SIGNATURE
TOTAL HOURS	49.50	

Assignment and Report

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	3. PERMIT/LICENSE NUMBER 438099078B06200	4a. TARGET DATE 9/30/2018	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

This inspection involved an inventory of 98 firearms and the examination of (b)(7) ATF Forms 4473. For the past twelve months the licensee acquired and disposed of (b)(4) and (b)(4) firearms, respectively. This inspection resulted in 9 violations. Notably, the licensee was cited for 478.102(a), failing to conduct a NICS check; this was a repeat violation. I concur with the recommendation of Warning Conference.

Viols WC with WL and Recall

☒ REVIEWED

☒ CONCUR

☐ SEE COMMENTS

☐ FINAL DISPOSITION

SIGNATURE AND TITLE

(b)(6) - Area Supervisor

REVIEW DATE

04/20/2018

REVIEW COMMENTS AND RECOMMENDATION

Viols WC with WL and Recall

☒ REVIEWED

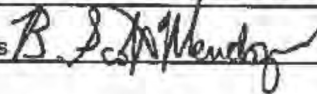
☒ CONCUR

☐ SEE COMMENTS

☒ FINAL DISPOSITION

SIGNATURE AND TITLE

BSMENDOZ - Director, Industry Operations



REVIEW DATE

04/26/2018

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 MISSION CRITICAL FIREARMS LLC	Street Address 48380 VAN DYKE AVE STE 400	City SHELBY TOWNSHIP	State MI	Zip Code 48317-	County MACOMB	Page 1 of 10 Pages
License/Permit/Registry Number (If any) 438099078B06200	Expiration Date 2/1/2018	Date(s) or Period of Inspection 02/01/2017 through 02/22/2018				

Inspection Results

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

Number: 1

Nature of Violation:

The licensee failed to furnish/obtain all of the information as called for by the headings on the form and instructions on or pertaining to the form. In addition, the licensee was at time completing a portion of the ATF F 4473 for the customer. This occurred in (b)(3) instances on the following forms:

b)(6) (b)(3) 112 PL 55 125 STAT 552

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

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

The licensee shall furnish/obtain all of the information as called for by the headings on the form and the instructions pertaining to the form. The licensee shall not complete any portion of the ATF F 4473 for the customer.

Report of Violations

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Name of Proprietor MISSION CRITICAL FIREARMS LLC	Street Address 48380 VAN DYKE AVE STE 400	City SHELBY TOWNSHIP	State MI	Zip Code 48317-	County MACOMB	Page 2 of 10 Pages
License/Permit/Registry Number (If any) 438099078B06200	Expiration Date 2/1/2018	Date(s) or Period of Inspection 02/01/2017 through 02/22/2018				

Inspection Results

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

b)(6) (b)(3) 112 PL 55 125 STAT 552

Citation: 27 CFR 478.21(a)

Report of Violations

Instructions

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Name of Proprietor MISSION CRITICAL FIREARMS LLC	Street Address 48380 VAN DYKE AVE STE 400	City SHELBY TOWNSHIP	State MI	Zip Code 48317-	County MACOMB	Page 3 of 10 Pages
License/Permit/Registry Number (If any) 438099078B06200	Expiration Date 2/1/2018	Date(s) or Period of Inspection 02/01/2017 through 02/22/2018				

Inspection Results

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

Number: 2

Nature of Violation:

The licensee failed to obtain the ATF F4473 from the transferee with all of the required information and certification by the transferee that the transferee is not prohibited. This occurred in 100% instances on the following forms:

b)(6) (b)(3) 112 PL 55 125 STAT 552

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee shall obtain the ATF F 4473 from the transferee with all of the required information and certification by the transferee that the transferee is not prohibited.

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 MISSION CRITICAL FIREARMS LLC	Street Address 48380 VAN DYKE AVE STE 400	City SHELBY TOWNSHIP	State MI	Zip Code 48317-	County MACOMB	Page 4 of 10 Pages
License/Permit/Registry Number (If any) 438099078B06200	Expiration Date 2/1/2018	Date(s) or Period of Inspection 02/01/2017 through 02/22/2018				

Inspection Results

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

12/19/17—Timothy Storgic (536)—12d.1 and 12d.2 blank

Citation: 27 CFR 478.124(c)(1)

Number: 3

Nature of Violation:

The licensee failed to verify the identity of the transferee by examining the identification document (as defined in § 478.11) presented and properly noting on the ATF F 4473 the identification document information. This occurred in (b)(3) instance on the following form:

b)(6) (b)(3) 112 PL 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)

The licensee shall verify the identity of the transferee by examining the identification document (as defined in § 478.11) presented and properly note on the ATF F 4473 the identification document information.

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 MISSION CRITICAL FIREARMS LLC	Street Address 48380 VAN DYKE AVE STE 400	City SHELBY TOWNSHIP	State MI	Zip Code 48317-	County MACOMB	Page 5 of 10 Pages
License/Permit/Registry Number (If any) 438099078B06200	Expiration Date 2/1/2018	Date(s) or Period of Inspection 02/01/2017 through 02/22/2018				

Inspection Results

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

Number: 4

Nature of Violation:

The licensee failed to record on the ATF F 4473 the date NICS was contacted, as well as any response provided, including transaction number. This occurred in (b)(3) instances on the following forms:

b)(6) (b)(3) 112 PL 55 125 STAT 552

[Redacted]

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

Number: 5

Nature of Violation:

The licensee failed to accurately identify the firearm to be transferred on the ATF F 4473. This occurred in (b)(3) instance on the following forms:

b)(6) (b)(3) 112 PL 55 125 STAT 552

[Redacted]

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee shall record on the ATF F 4473 the date NICS was contacted, as well as, any response provided, including the transaction number.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

3/28/18
The licensee shall identify the firearm to be transferred on the ATF F 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 MISSION CRITICAL FIREARMS LLC	Street Address 48380 VAN DYKE AVE STE 400	City SHELBY TOWNSHIP	State MI	Zip Code 48317-	County MACOMB	Page 6 of 10 Pages
License/Permit/Registry Number (If any) 438099078B06200	Expiration Date 2/1/2018	Date(s) or Period of Inspection 02/01/2017 through 02/22/2018				

Inspection Results

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

Citation: 27 CFR 478.124(c)(4)

Number: 6

Nature of Violation:

The licensee failed to accurately date the form upon transfer of the firearm described on the form.
This occurred in (b)(3) instances on the following forms:

b)(6) (b)(3) 112 PL 55 125 STAT 552
[Redacted]

Citation: 27 CFR 478.124(c)(5)

Date Corrections to be Made: 3/28/18
(If not corrected immediately)

Corrective Action to be Taken: The licensee shall accurately date the form upon transfer of the firearm described on the form.
(If not corrected immediately)

Report of Violations

Instructions

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Name of Proprietor MISSION CRITICAL FIREARMS LLC	Street Address 48380 VAN DYKE AVE STE 400	City SHELBY TOWNSHIP	State MI	Zip Code 48317-	County MACOMB	Page 7 of 10 Pages
License/Permit/Registry Number (If any) 438099078B06200	Expiration Date 2/1/2018	Date(s) or Period of Inspection 02/01/2017 through 02/22/2018				

Inspection Results

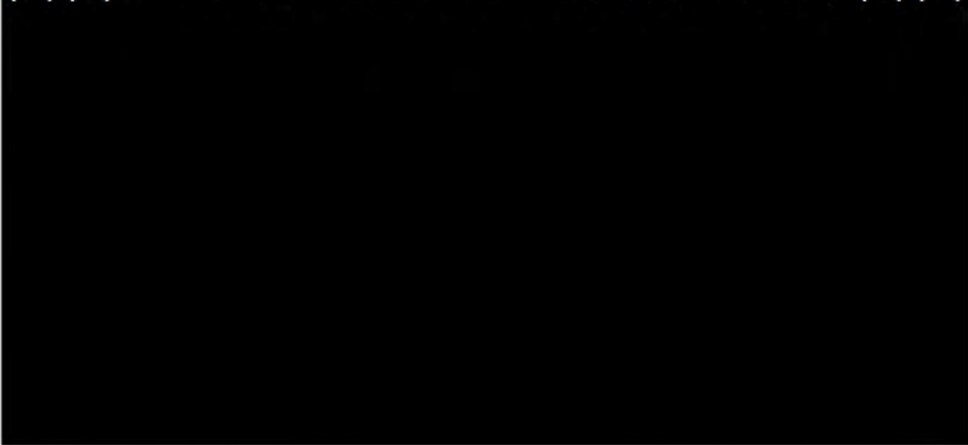
An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

Number: 7

Nature of Violation:

The licensee failed to conduct a NICS check or obtain an alternate permit prior to transferring a firearm to a non-licensee. This occurred in (b)(3) - 1 instances. The licensee accepted a certification letter from a law enforcement officer that did not meet the requirements of 27 CFR 478.134.

(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)

The licensee shall conduct a NICS check or obtain an alternate permit prior to transferring a firearm to a non-licensee. When transferring a firearm to a law enforcement officer on certification letter, the letter must be signed by the department chief or other person in authority.

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.

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License/Permit/Registry Number (If any) 438099078B06200	Expiration Date 2/1/2018	Date(s) or Period of Inspection 02/01/2017 through 02/22/2018				

Inspection Results

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

Citation: 27 CFR 478.102(a)

Report of Violations

Instructions

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License/Permit/Registry Number (If any) 438099078B06200	Expiration Date 2/1/2018	Date(s) or Period of Inspection 02/01/2017 through 02/22/2018				

Inspection Results

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

Number: 8

Nature of Violation:

The licensee failed to record the transfer of a firearm to a non-licensee on the ATF F 4473. This occurred in (b)(6) instances. The licensee accepted a certification letter from a law enforcement officer that did not meet the requirements of 27 CFR 478.134.

Date Corrections to be Made:

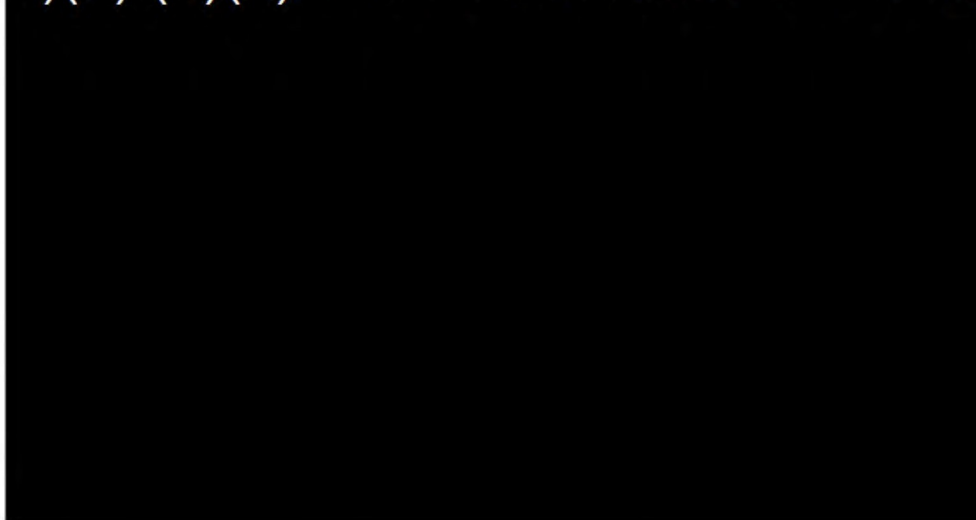
(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee shall record the transfer of a firearm to a non-licensee on the ATF F 4473. When transferring a firearm to a law enforcement officer on certification letter, the letter must be signed by the department chief or other person in authority. In addition, the firearm must be for official use.

b)(6) (b)(3) 112 PL 55 125 STAT 552



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.

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License/Permit/Registry Number (If any) 438099078B06200	Expiration Date 2/1/2018	Date(s) or Period of Inspection 02/01/2017 through 02/22/2018				

Inspection Results

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

Citation: 27 CFR 478.124(a)

Number: 9

Nature of Violation:

The licensee failed to accurately record the disposition of firearms. In each instance the licensee did not record the name of the individual to whom disposed, rather only the form number was recorded.

(b)(3) 112 PL 55 125 STAT 552

Date Corrections to be Made: 3/28/18
(If not corrected immediately)

Corrective Action to be Taken: The licensee shall record complete and accurate disposition information in the acquisition and disposition record.
(If not corrected immediately)

Citation: 27 CFR 478.123(d)

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

Date
3-14-18

Signature and Title of ATF Officer

(b)(6)

Date
3/14/18

FIREARMS INSPECTION REPORT

Name: Mission Critical Firearms LLC
Trade Name:

UI#: 774030-2018-0154-B1B
FFL#: 4-38-099-07-8B-06200

Address: 48380 Van Dyke, Ste. 400
Shelby Township, MI 48317; Macomb County

1 - Introduction

Inspection Profile:

On February 22, 2017, Senior Industry Operations Investigator (IOI) (b)(6) and IOI (b)(6) initiated a firearms compliance inspection on Mission Critical Firearms LLC. The inspection was attempted during business hours on record. Owner and responsible person Youshia Edward Pireh was not initially available. After waiting for approximately one hour, Senior IOI (b)(6) contacted Mr. Pireh at the phone number on file. He arrived at the premises within 45 minutes.

The inspection was initially attempted, unannounced, on January 16, 2018. No one was available at the business premises. This inspection was conducted in conjunction with the inspection of Mission Critical's type 09 FFL, 4-38-08680, UI 774030-2017-0343. Immediately following the inspection of the FFLs, an SEA inspection was conducted on the licensee's type 26 explosives license, 4-MI-01359, UI 774030-2018-0028.

Business Profile:

The licensee deals primarily with other licensees, law enforcement officers, and government agencies. He rarely deals with the general public. He does complete transfers for individuals who purchase firearms via the internet. Mr. Pireh stated that most of those are purchases of silencers made through silencershop.com. In the last 12 months, the licensee acquired approximately (b)(4) firearms and disposed of approximately (b)(4) firearms. The licensee deals in new firearms, with an equal amount of handguns and long guns. The main suppliers are (b)(4). The licensee does not conduct business at gun shows. A website is maintained at missioncriticalfirearms.com. The licensee maintains off site storage at (b)(6) approximately 30 minutes from the business premises.

There is no other business conducted at the premises. Mr. Pireh stated he has no outside employment. Zoning compliance was verified by Industry Operations Intel Specialist (b)(6) in September 2015. This license has been held since January 2012.

FIREARMS INSPECTION REPORT

Name: Mission Critical Firearms LLC
Trade Name:

UI#: 774030-2018-0154-B1B
FFL#: 4-38-099-07-8B-06200

Ownership and Control:

Mission Critical Firearms LLC is a limited liability company registered with the State of Michigan Department of Licensing and Regulatory Affairs **(Exhibit One)**. Mr. Pireh holds one hundred percent interest in the company. Currently Matthew Tuzas and Daniel Zaremba are listed as responsible persons.

(b)(6)

Variance:

There are no variances held.

2 - Recommendation

Warning Conference with Recall. The violations could merit a Warning Letter; however, the two previous inspections resulted in Warning Letters and similar violations were cited during this inspection. Therefore, a Warning Conference is recommended.

3 - Inspection History

Date of Inspection: 10/12/2016
Type of Inspection: Recall
UI#: 774030-2016-0212-B1B
Inspection Results: Warning Letter
Cited Violations: 27 CFR 478.102(a) and 27 CFR 478.126a

Date of Inspection: 8/24/2015
Type of Inspection: Compliance
UI#: 774030-2015-0282-B1B
Inspection Results: Warning Letter
Cited Violations: 27 CFR 478.125(e) and 27 CFR 478.41

Date of Inspection: 1/3/2012
Type of Inspection: Qualification
UI#: 774030-2012-0138-B1B
Inspection Results: License issued
Cited Violations: None

FIREARMS INSPECTION REPORT

Name: Mission Critical Firearms LLC
Trade Name:

UI#: 774030-2018-0154-B1B
FFL#: 4-38-099-07-8B-06200

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

A full inventory of the firearms on hand was compared to the A&D records. The licensee maintains a separate record for NFA firearms. There were no thefts or losses reported during the inspection period or as a result of the inspection. The record is in the proper format.

There were (b)(3) 112 open dispositions in the A&D records and (b)(3) firearms in inventory. Upon the initial inventory, there were some open dispositions with no firearm in physical inventory. Mr. Pireh stated some firearms were being stored at his residence. Upon return to the premises the following day, Mr. Pireh had brought the firearms stored at (b)(6) to the business premises. Some of the open dispositions now contained disposition information. (b)(3) - 26 USC 6103

All open dispositions/firearms were accounted for.

In some instances, the complete disposition was not recorded. Mr. Pireh was only recording what appeared to be the ATF F 4473 number for the transfer. The name to whom transferred was not being recorded. **See Violation Nine, Worksheet One, and Exhibit Two**

Mr. Pireh stated that he is the only person responsible for and making entries in the A&D record. He stated that he is not the neatest or most organized with record keeping. Senior IOI (b)(6) suggested that he consider using electronic records, which could cut down on or eliminate errors.

5 - ATF Forms 4473 – NICS & Other Dispositions

A total of (b)(3) ATF Forms 4473 were on file for the past 12 months and a total of (b)(3) ATF Forms 4473 were reviewed by Senior IOI (b)(6) and IOI (b)(6). There were two NICS transaction numbers listed on the FFL audit log that were compared to the ATF Forms 4473 with no discrepancies. The IOIs compared (b)(3) ATF Forms 4473 to the A&D record. Transfers to other licensees were documented properly. There were (b)(3) 112 transfers to law enforcement officers documented on department letterhead. However, the letters were signed by the individual officers and indicated personal as well as official use. These letters did not meet the requirements of 27 CFR 478.134. Several of the forms had similar "x" markings on Section 11 (prohibiting questions). IOI (b)(6) asked Mr. Pireh if he was completing the form for the customer and Mr. Pireh stated that sometimes he would because the customer would take too long. A total of (b)(3) forms contained errors or omissions.

FIREARMS INSPECTION REPORT

Name: Mission Critical Firearms LLC
Trade Name:

UI#: 774030-2018-0154-B1B
FFL#: 4-38-099-07-8B-06200

The licensee was cited for failure to furnish/obtain all of the information as called for by the headings on the form and the instructions on or pertaining to the form. **Violation One, Worksheet Two and Exhibit Three**

The licensee was cited for failure to obtain a complete ATF F 4473, including certification from the transferee. **Violation Two, Worksheet Two and Exhibit Four**

The licensee was cited for failure to accurately record complete identification information on the ATF F 4473. **Violation Three, Worksheet Two and Exhibit Five**

The licensee was cited for failure to record complete NICS information on the ATF F 4473. **Violation Four, Worksheet Two and Exhibit Six**

The licensee was cited for failure to record complete firearm information on the ATF F 4473. **Violation Five, Worksheet Two and Exhibit Seven**

The licensee was cited for failure to accurately date the ATF F 4473 upon transfer of a firearm. **Violation Six, Worksheet Two and Exhibit Eight**

The licensee was cited for failure to conduct a NICS check prior to transfer of a firearm to a non-licensee. **Violation Seven, Worksheet Two and Exhibit Nine**

The licensee was cited for failure to record the transfer of a firearm to a non-licensee on an ATF F 4473. **Violation Eight, Worksheet Two, and Exhibit Nine**

6 - Multiple Sales

Per the Violent Crime Analysis Branch FFL Master Query, there were no multiple sales reported during the inspection period. There were no unreported multiple sales discovered.

7 - Suspicious/Prohibited Purchasers

There were no suspicious/prohibited purchasers identified. Criminal history checks were complete on five purchasers. This included those with “yes” or blank responses to the prohibiting questions, and a transfer with a blank NICS response. No prohibiting information was disclosed. A criminal history check was also conducted on (b)(3) 112 of the law enforcement officers as he had made a previous purchase and an ATF F 4473 was on file. No prohibiting information was disclosed. There was not enough identifying information on the other (b)(3) 112 law enforcement officers to conduct criminal history checks.

FIREARMS INSPECTION REPORT

Name: Mission Critical Firearms LLC
Trade Name:

UI#: 774030-2018-0154-B1B
FFL#: 4-38-099-07-8B-06200

The persons in authority for the police departments listed on the letter heads were contacted. Each verified that the individuals were indeed law enforcement officers in their respective departments. Each was advised that such letters must be signed by the Chief/Commissioner or delegate and the firearm must be for official use only. No further action is required from ATF.

8 - Trace Activity

There were no firearms traced to the licensee in the past 12 months. A secondary market analysis was not conducted.

9 - NFA/Importer/Collector/Manufacturer

The licensee does not conduct activities as an importer or collector. The licensee is a manufacturer and deals in firearms that fall under the purview of (b)(3) - 26 USC 6103

[REDACTED]

(b)(3) - 26 USC 6103

[REDACTED]

(b)(3) - 26 USC 6103

[REDACTED]

There were no firearms manufactured in the past 12 months. The licensee is compliant in submitting the Annual Firearms Manufacturing and Export Report.

10 - Referrals

There were no referrals submitted as a result of this inspection.

(b)(3) - 26 USC 6103
[REDACTED]

FIREARMS INSPECTION REPORT

Name: Mission Critical Firearms LLC
Trade Name:

UI#: 774030-2018-0154-B1B
FFL#: 4-38-099-07-8B-06200

(b)(3) - 26 USC 6103

When questioned, Mr. Pireh stated to Senior IOI (b)(6) that he does intend to put the licenses issued to Mission Critical Firearms LLC out of business. He will be obtaining a new FFL under a different entity and is the process of obtaining a new location for the business. Once the new license is acquired any remaining inventory owned by Mission Critical will be transferred to the new license. Senior IOI (b)(6) advised that he would need to submit the ATF Form 3 prior to the SOT expiring or he would need to re-new it for 2019 to avoid the \$200 transfer fee.

11 - Other

(b)(6)

12 - Closing Actions

On March 14, 2018, Senior IOI (b)(6) and IOI (b)(6) returned to the business premises. The closing conference was held with the licensee at this time. Senior IOI (b)(6) issued and reviewed the Report of Violations (ROV) with Mr. Pireh. Mr. Pireh stated he understood each violation and he was given the opportunity to respond to each violation. Senior IOI (b)(6) and Mr. Pireh signed the ROV and a copy was left for his records.

On this day, Senior IOI (b)(6) also reviewed the regulations as outlined on the Acknowledgement of Federal Firearms Regulations with Mr. Pireh. All questions were addressed. Completion of the ATF F 4473 Firearm Transaction Record, Acquisition

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and Disposition record, and NICS background checks were discussed. The applicant was advised of various State of Michigan requirements pertaining to the sale of firearms, the Youth Handgun Safety Act, and the Child Safety Lock Act of 2005. Mr. Pireh was also advised on the possible requirement to register with the Department of State, Directorate of Defense Trade Controls. Senior IOI (b)(6) and Mr. Pireh signed the Acknowledgment and a copy was left for his records (**Exhibit Ten**). See **Exhibit Eleven** for a list of reference material provided. The closing conference was conducted in conjunction with the closing conference for the type 09 FFL inspection, 774030-2017-0343 and the SEA inspection 774030-2018-0028.

13 - Violations

1. 27 CFR 478.21(a)

Nature of Violation: The licensee failed to furnish/obtain all of the information as called for by the headings on the form and instructions on or pertaining to the form. In addition, the licensee was at times completing a portion of the ATF F 4473 for the customer. This occurred in (b)(3) instances on the following forms:

b)(6) (b)(3) 112 PL 55 125 STAT 552



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b)(6) (b)(3) 112 PL 55 125 STAT 552

Licensee's Response: Mr. Pireh understood the violation. When asked for a response or reason why this occurred, Mr. Pireh stated "none; I was wrong."

Corrective Action: The licensee shall furnish/obtain all of the information as called for by the headings on the form and the instructions pertaining to the form. The licensee shall not complete any portion of the ATF F 4473 for the customer.

Worksheet Two and Exhibit Three

2. 27 CFR 478.124(c)(1)

Nature of Violation: The licensee failed to obtain the ATF F4473 from the transferee with all of the required information and certification by the transferee that the transferee is not prohibited. This occurred in ^{(b)(3)} instances on the following forms:

b)(6) (b)(3) 112 PL 55 125 STAT 552

Licensee's Response: No specific response. Mr. Pireh understood this violation.

Corrective Action: The licensee shall obtain the ATF F 4473 from the transferee with all of the required information and certification by the transferee that the transferee is not prohibited.

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Worksheet Two and Exhibit Four

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

Nature of Violation: The licensee failed to verify the identity of the transferee by examining the identification document (as defined in § 478.11) presented and properly noting on the ATF F 4473 the identification document information. This occurred in (b)(3), 112 instance on the following form:

b)(6) (b)(3) 112 PL 55 125 STAT 552

Licensee's Response: No specific response. Mr. Pireh understood this violation.

Corrective Action: The licensee shall verify the identity of the transferee by examining the identification document (as defined in § 478.11) presented and properly note on the ATF F 4473 the identification document information.

Worksheet Two and Exhibit Five

4. **27 CFR 478.124(c)(3)(iv)**

Nature of Violation: The licensee failed to record on the ATF F 4473 the date NICS was contacted, as well as any response provided, including transaction number. This occurred in (b)(3), 112 instances on the following forms:

b)(6) (b)(3) 112 PL 55 125 STAT 552

Licensee's Response: No specific response. Mr. Pireh understood this violation.

Corrective Action: The licensee shall record on the ATF F 4473 the date NICS was contacted, as well as, any response provided, including the transaction number.

Worksheet Two and Exhibit Six

5. **27 CFR 478.124(c)(4)**

Nature of Violation: The licensee failed to accurately identify the firearm to be transferred on the ATF F 4473. This occurred in (b)(3), 112 instance on the following forms:

b)(6) (b)(3) 112 PL 55 125 STAT 552

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FFL#: 4-38-099-07-8B-06200

(b)(6) (b)(3) 112 PL 55 125 STAT 552

Licensee Response: Mr. Pireh stated this was “sloppy, my fault.” He understood this violation.

Corrective Action: The licensee shall identify the firearm to be transferred on the ATF F 4473. On March 14, 2018, Mr. Pireh contacted Senior IOI (b)(6) and advised that he completed these corrections.

Worksheet Two and Exhibit Seven

6. **27 CFR 478.124(c)(5)**

Nature of Violation: The licensee failed to accurately date the form upon transfer of the firearm described on the form. This occurred in (b)(3) 112 instances on the following forms:

(b)(6) (b)(3) 112 PL 55 125 STAT 552

Licensee’s Response: No specific response. Mr. Pireh understood this violation.

Corrective Action: The licensee shall accurately date the form upon transfer of the firearm described on the form. On March 14, 2018, Mr. Pireh contacted Senior IOI (b)(6) and advised that he completed these corrections.

Worksheet Two and Exhibit Eight

7. **27 CFR 478.102(a)—repeat violation from 2016 inspection**

Nature of Violation: The licensee failed to conduct a NICS check or obtain an alternate permit prior to transferring a firearm to a non-licensee. This occurred in (b)(3) - 112 instances. The licensee accepted a certification letter from a law enforcement officer that did not meet the requirements of 27 CFR 478.134.

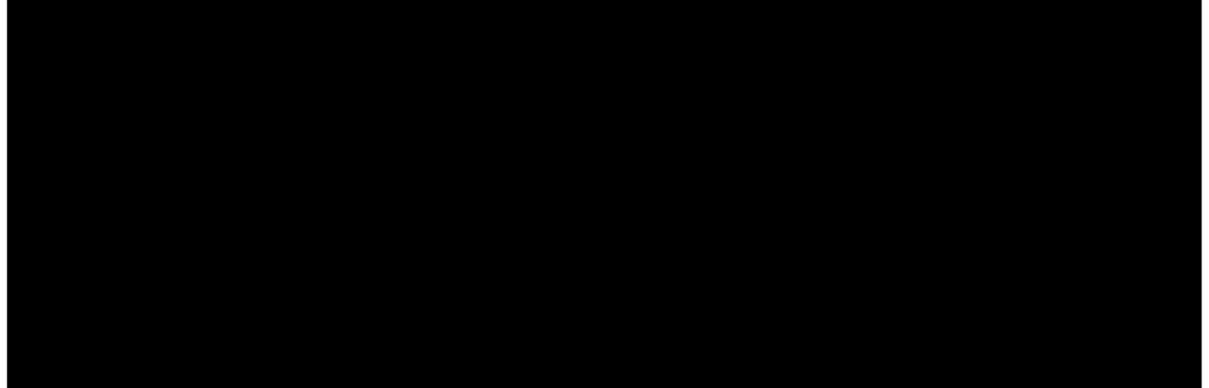
(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

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



Licensee's Response: Mr. Pireh stated "I was wrong." He understood this violation.

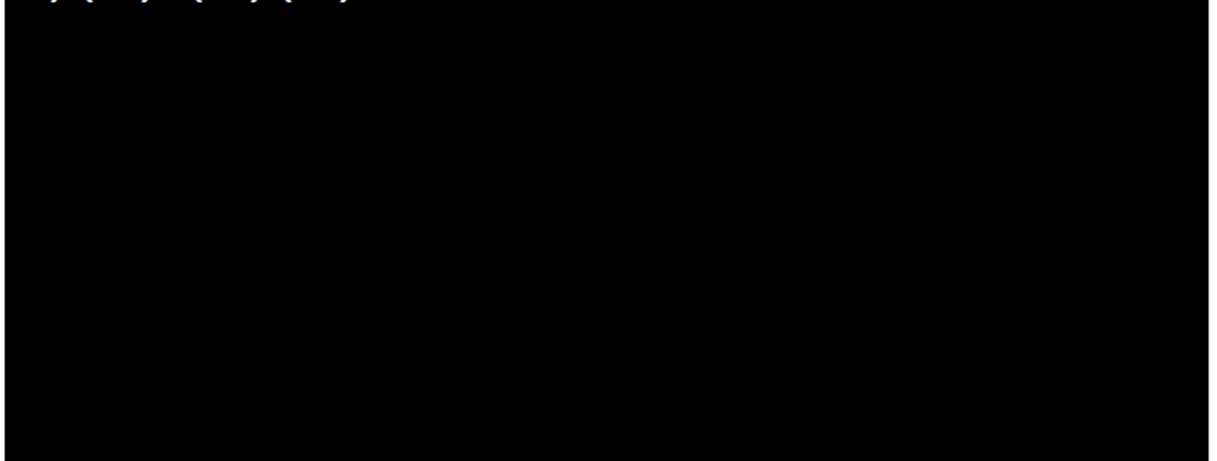
Corrective Action: The licensee shall conduct a NICS check or obtain an alternate permit prior to transferring a firearm to a non-licensee. When transferring a firearm to a law enforcement officer on certification letter, the letter must be signed by the department chief or other person in authority. In addition, the firearm must be for official use. Senior IOI (b)(6) reviewed 27 CFR 478.134 with Mr. Pireh.

Worksheet Two and Exhibit Nine

8. **27 CFR 478.124(a)**

Nature of Violation: The licensee failed to record the transfer of a firearm to a non-licensee on the ATF F 4473. This occurred in (b)(3) instances. The licensee accepted a certification letter from a law enforcement officer that did not meet the requirements of 27 CFR 478.134.

b)(6) (b)(3) 112 PL 55 125 STAT 552



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(b)(6) (b)(3) 112 PL 55 125 STAT 552

Licensee's Response: Mr. Pireh stated "I was wrong." He understood this violation.

Corrective Action: The licensee shall record the transfer of a firearm to a non-licensee on the ATF F 4473. When transferring a firearm to a law enforcement officer on certification letter, the letter must be signed by the department chief or other person in authority. In addition, the firearm must be for official use. Senior IOI **(b)(6)** reviewed 27 CFR 478.134 with Mr. Pireh.

Worksheet Two and Exhibit Nine

9. 27 CFR 478.123(d)—repeat violation of 2015 inspection

The licensee failed to accurately record the disposition of **(b)(3)** firearms. In each instance the licensee did not record the name of the individual to whom disposed, rather only the form number was recorded.

(b)(3) 112 PL 55 125 STAT 552

Licensee's Response: Mr. Pireh stated the machineguns were transferred to another licensee on a Form 3 or to a government agency on a Form 5. The number in the book refers to a Form 3 or Form 5.

Corrective Action: The licensee shall record complete and accurate disposition information in the acquisition and disposition record. Mr. Pireh made the corrections to the record. Senior IOI **(b)(6)** verified the corrections during the Warning Conference.

Worksheet One and Exhibit Two

FIREARMS INSPECTION REPORT

Name: Mission Critical Firearms LLC
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FFL#: 4-38-099-07-8B-06200

X

Industry Operations Investigator

Index of Worksheets and Exhibits

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Worksheet Two: ATF F 4473 review

Exhibit One: Corporate Filing

Exhibit Two: A&D record photos (Violation Nine)

Exhibit Three: Violation One ATF Forms 4473

Exhibit Four: Violation Two ATF Forms 4473

Exhibit Five: Violation Three ATF Forms 4473

Exhibit Six: Violation Four ATF Forms 4473

Exhibit Seven: Violation Five ATF Forms 4473

Exhibit Eight: Violation Six ATF Forms 4473

Exhibit Nine: Law Enforcement Letters (Violations Seven and Eight)

Exhibit Ten: Acknowledgement

Exhibit Eleven: Reference Material Provided

Worknote: NFA Inventory Discrepancies

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U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

www.atf.gov

774030:(b) (6)
5370

May 2, 2018

Mission Critical Firearms LLC
48380 Van Dyke; Ste. 400
Shelby Township, MI 48317

Re: Federal Firearms License Number: 4-38-06200

Dear Mr. Pireh:

As a result of a recent compliance inspection conducted by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) at your firearms business located at 48380 Van Dyke; Ste. 400, Shelby Township, MI 48317 on February 22, 2018 through March 14, 2018, you were cited for violations of 27 Code of Federal Regulations, Part 478. The violations were discussed with you during the inspection. A copy of the Report of Violations, ATF Form 5030.5, issued at the time of the inspection is enclosed.

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 in the Detroit Field Office located at 1155 Brewery Park Blvd.; Ste. 300, Detroit, MI 48207 on May 14, 2018 at 11:00 A.M. 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 documentation verifying the corrective action you have taken and any compliance plan you have developed to ensure these violations do not recur.**

Also, you are hereby notified that, pursuant to 18 U.S.C. § 930(a), no person may bring a firearm or other dangerous weapon into an ATF office. Possession of a firearm or other dangerous weapon in an ATF office may result in a fine of \$100,000 or imprisonment for not more than 1 year or both.

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

Mr. Pireh

Federal Firearms License Number: 4-38-06200

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 Industry Operations Investigator (b)(6) at (b)(6) or me at (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,

(b) (6)

Area Supervisor
Detroit Field Office

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mission Critical Firearms LLC
48380 Van Dyke; Ste. 400
Shelby Township, MI 48317

2. 7014 0150 0000 0573 1325

PS Form 3811, July 2013

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

Pireh

C. Date of Delivery

5/2/18

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail®☐ Priority Mail Express™☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mission Critical Firearms LLC
48380 Van Dyke; Ste. 400
Shelby Township, MI 48317

2. 7014 0150 0000 0573 1325

PS Form 3811, July 2013

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail®☐ Priority Mail Express™☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes

See Reverse for Instructions

PS Form 3800, August 2005

Mission Critical Firearms LLC

48380 Van Dyke; Ste. 400

Shelby Township, MI 48317

(DATE 5/2/18 MISTY W/C)

Postmark
Here

Postage

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

U.S. Postal ServiceTM
CERTIFIED MAILTM RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

52ET E250 0000 0570 4102
52ET E250 0000 0570 4102CERTIFIED MAILTMPLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
DETROIT FIELD DIVISION**

DETROIT AREA OFFICE

FIREARMS WARNING CONFERENCE

May 14, 2018

I. Licensee Information

UI#: 774030-2018-0154-B1B

Federal Firearms License (FFL) Number: 4-38-07-06200

Name: Mission Critical Firearms LLC.

Address: 48380 Van Dyke, Ste. 400

Shelby Township, MI 48317 (Macomb)

The licensee is a limited liability company. The sole owner/member is Youshia Edward "Ed" Pireh. The above business premises is in a small store front/office in commercial area. The licensee sells primarily new firearms and deals with local law enforcement agencies. The licensee is a Special Occupational Tax payer.

II. Introduction

A Warning Conference was held on May 14, 2018 at 11:00 am at the Detroit Field Division. In attendance representing the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) were Detroit Area Supervisor (b)(6) and Industry Operations Investigators, (b)(6) and (b)(6). In attendance representing Mission Critical Firearms LLC was owner/member Ed Pireh.

III. Synopsis

The licensee had previously submitted notice to the National Firearms Act (NFA) branch that he would be discontinuing business as of April 2017. The licensee requested exemption for the "law letter" requirement for transfers of restricted machine guns. Transfers were approved, yet as of February 2018, the licensee was still in business and had continued to acquire/dispose of NFA firearms.

Mr. Pireh stated to A/S (b)(6) that he will be discontinuing business under this license and the new business should have opened a long time ago. He has hit some snags and is

currently awaiting loan approval for the new location. The new location will consist of an 800 square foot showroom and 3,500 square foot area divided into various training rooms. Mr. Pireh stated the acquired suppressors in bulk due to the low cost received from the supplier. He has not acquired any new machine guns.

During the inspection period, the licensee acquired (b)(4) firearms and disposed of (b)(4) firearms.

IV. Violations

1. 27 CFR 478.21(a)
2. 27 CFR 478.124(c)(1)
3. 27 CFR 478.124(c)(3)(i)
4. 27 CFR 478.124(c)(3)(iv)
5. 27 CFR 478.124(c)(4)
6. 27 CFR 478.124(c)(5)

Review/Discussion: A/S (b) (6) reviewed the violations.

Licensee response to the violation: Mr. Pireh stated that he is the only person conducting the business operations. At times he begins talking with his customers which may cause him to make mistakes. As to completing a portion of the ATF F 4473 for the customer, Mr. Pireh stated that since the questions on the ATF F 4473 are the same as those on a Form 4 (for NFA transfers) he didn't see how it was any different as him completing and submitting the Form 4 electronically for the customer. He stated that the questions pertaining to non-immigrant aliens can get confusing. The errors have been brought to his attention and he understands how the forms need to be completed.

ATF response to licensee (guidance, directives etc): A/S (b) (6) emphasized the importance of obtaining and completing the required information on the ATF F 4473. A/S (b) (6) emphasized that having a properly completed form, which includes the transferred firearm information, is key for completing firearms traces.

7. 27 CFR 478.102(a)
8. 27 CFR 478.124(a)

Review/Discussion: A/S (b) (6) reviewed the violations.

Licensee response to the violation: Mr. Pireh stated he understood and would not accept certification letters unless signed by the Chief. This was a mistake on his behalf.

ATF response to licensee (guidance, directives etc): A/S (b) (6) advised that a violation for not conducting NICS checks could lead to possible fines, for each instance, and suspension of the firearms license.

9. 27 CFR 478.123(d)

Review/Discussion: A/S (b) (6) reviewed the violation.

Licensee response to the violation: Mr. Pireh stated that he is considering utilizing electronic records in the future. Mr. Pireh also presented the acquisition and disposition records and IOI (b)(6) verified that the entries had been corrected.

ATF response to licensee (guidance, directives etc): IOI (b)(6) advised that computerized records would be beneficial to his operations.

V. **Closing Summary**

AS (b) (6) discussed the definition of willfulness in regards to revocation of the firearms license. Mr. Pireh understood. Mr. Pireh also discussed the future plans for his business operations which include creating a new entity, obtaining a new location, and expanding training for law enforcement personnel.