

## Assignment and Report

<b>1. OPERATING NAME AND ADDRESS</b> (INCLUDE ZIP CODE AND COUNTY) Ed's Pawn Shop, Inc. Ed's Public Safety 4431 N. Henry Boulevard Stockbridge, GA 30281, Henry	<b>2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.)</b> 760530-2016-0026-B1B			
	<table border="1" style="width: 100%; border-collapse: collapse;"><tr><td style="width: 33%;"><b>3. PERMIT/LICENSE NUMBER</b> 158151027B39571</td><td style="width: 33%;"><b>4a. TARGET DATE</b> 8/15/2016</td><td style="width: 33%;"><b>4b. TARGET HOURS</b></td></tr></table>	<b>3. PERMIT/LICENSE NUMBER</b> 158151027B39571	<b>4a. TARGET DATE</b> 8/15/2016	<b>4b. TARGET HOURS</b>
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	<b>5. REQUESTED BY (SIGNATURE, TITLE AND DATE)</b>			

<b>6. ATF OFFICER(S) ASSIGNED</b> (b)(6) - Assigned Investigator (b)(6) - Assigned Investigator (b)(6) - Assigned Investigator (b)(6) - Assigned Investigator (b)(6) - Lead Investigator (b)(6) - Assigned Investigator (b)(6) - Assigned Investigator	
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<b>7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)</b> (b)(6) Area Supervisor, 10/16/2015	
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<b>8. PURPOSE/SPECIAL INSTRUCTIONS</b> Conduct Recall Firearms Compliance Inspection. Last inspection resulted in adverse action or a recommended recall. Obtain printout from NTC. Identify and refer potential traffickers.  NOTE: Last inspection date: 02/17/2015 WC Held: 08/10/2015	
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<b>9. INSPECTION RESULTS</b> <table border="1" style="width: 100%; border-collapse: collapse;"><tr><td style="width: 25%;">NO. OF VIOLATIONS</td><td style="width: 25%;">8</td><td style="width: 25%;">NO. OF REFERRALS</td><td style="width: 25%;">4</td></tr><tr><td>NO. OF TECS CHECKS</td><td>136</td><td>NO. OF TECS HITS</td><td>3</td></tr><tr><td rowspan="2">NO. OF TAX ADJUSTMENTS</td><td rowspan="2"></td><td>\$ VALUE OF TAX INCREASES</td><td></td></tr><tr><td>\$ VALUE OF TAX DECREASES</td><td></td></tr><tr><td>NO. OF ASSESSMENTS</td><td></td><td>\$ VALUE OF ASSESSMENTS</td><td></td></tr><tr><td>NO. OF CLAIMS</td><td></td><td>\$ VALUE OF CLAIMS</td><td></td></tr><tr><td>NO. OF TAX PERIODS</td><td></td><td>\$ VALUE OF TAXES VERIFIED</td><td></td></tr></table>	NO. OF VIOLATIONS	8	NO. OF REFERRALS	4	NO. OF TECS CHECKS	136	NO. OF TECS HITS	3	NO. OF TAX ADJUSTMENTS		\$ VALUE OF TAX INCREASES		\$ VALUE OF TAX DECREASES		NO. OF ASSESSMENTS		\$ VALUE OF ASSESSMENTS		NO. OF CLAIMS		\$ VALUE OF CLAIMS		NO. OF TAX PERIODS		\$ VALUE OF TAXES VERIFIED		<b>10. TRAVEL EXPENSES (OPTIONAL)</b> <table border="1" style="width: 100%; border-collapse: collapse;"><tr><td style="width: 50%;">2111 - PER DIEM</td><td style="width: 50%;"></td></tr><tr><td>2112 - P.O.A.</td><td></td></tr><tr><td>2113 - COMM. AIR</td><td></td></tr><tr><td>2114 - RENTAL CAR</td><td></td></tr><tr><td>2115 - GPV EXPENSES</td><td></td></tr><tr><td>2116 - MISC.</td><td></td></tr><tr><td>TOTAL \$ FOR INSP.</td><td></td></tr></table>	2111 - PER DIEM		2112 - P.O.A.		2113 - COMM. AIR		2114 - RENTAL CAR		2115 - GPV EXPENSES		2116 - MISC.		TOTAL \$ FOR INSP.	
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<b>11. ATF OFFICER'S RECOMMENDATION</b> Submitted by (b)(6) - Industry Operations Investigator  Submitted on: 09/21/2016  Viols DIO (or Delegate) Held WC ILO Revocation	
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<b>12. TIME ACCOUNTING DATA</b>			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)		
JUN 2016		17.00	
ATF OFFICER'S SUBTOTAL	17.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)		
JUN 2016		19.00	
ATF OFFICER'S SUBTOTAL	19.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)		
JUN 2016		35.50	

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	3. PERMIT/LICENSE NUMBER 158151027B39571	4a. TARGET DATE 8/15/2016	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

### 12. TIME ACCOUNTING DATA

ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)
JUL 2016	1.00
ATF OFFICER'S SUBTOTAL	36.50
ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)
FEB 2016	.50
JUN 2016	127.00
JUL 2016	17.50
AUG 2016	27.00
SEP 2016	3.00
DEC 2016	3.50
ATF OFFICER'S SUBTOTAL	178.50
ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)
JUN 2016	16.00
ATF OFFICER'S SUBTOTAL	16.00
ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)
JUN 2016	24.00
ATF OFFICER'S SUBTOTAL	24.00
ATF OFFICER'S SIGNATURE	
TOTAL HOURS	291.00

### 13. REVIEW AND ROUTING

#### REVIEW COMMENTS AND RECOMMENDATION

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

According to the Administrative Action Policy, ATF O 5370.1B, paragraph 6(e)(4)(a), the Licensee would merit revocation for the transfer of a firearm to a person knowing or having reason to believe that the transferee is a prohibited. In accordance with ATF O 5370.1B, paragraph 9(a)(2). However, a warning conference in lieu of revocation based on the following reasons.

Violation for 27 CFR 478.99(c) merits revocation. Three (3) violations merit a report of violations only (27 CFR 478.21(a), 478.124(c)(1), & 478.124(c)(3)(iv); three (3) merits a warning letter only (27 CFR 478.102(a)(1), 478.124(c)(3)(i) & 478.126a); and one (1) merits a warning conference (478.99(a)). Two of three that merits a warning letter would merit a warning conference based on Repeat violations.

The Licensee is a large volume dealer who conducted approximately (b)(3) transactions on ATF Forms 4473 in the 12-month inspection period, a total of (b)(3) ATF Forms 4473 were cited among the eight violations; an error rate of 0.3%.

he Licensee timely reported an estimated (b)(3) multiple sale transactions involving 636 firearms over the last 12-months.

The Licensee accounted for all inventory and acquisition and disposition entries during the inspection period. There were approximately 3,826 firearms in inventory, (b)(4) acquisitions and (b)(4) dispositions over the last 12-months.

The Licensee responded successfully to (b)(3) firearms trace requests during the 12-month inspection period.

Viols DIO (or Delegate) Held WC ILO Revocation

☒ REVIEWED

☒ CONCUR

☒ SEE COMMENTS

☐ FINAL DISPOSITION

SIGNATURE AND TITLE

REVIEW DATE

(b)(6) - Area Supervisor

09/21/2016

## Assignment and Report

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### 13. REVIEW AND ROUTING

#### REVIEW COMMENTS AND RECOMMENDATION

The DIO concurs with the recommendation of a WC ILO Revocation based on the following: The investigation disclosed eight violations of which five warrant an administrative involving a WL for violations of 27 CFR 478.102(a)(1) in <sup>(b)(3)</sup> instance; 27 CFR 478.124(c)(3)(i) in <sup>(b)(3)</sup> instance; 27 CFR 478.126a in <sup>(b)(3)</sup> instances; a WC for violation of 27 CFR 478.99(a) in <sup>(b)(3)</sup> instances, and revocation for the violation of 27 CFR 478.99(c) in <sup>(b)(3)</sup> instances. The repeat violations of 478.124(c)(3)(i) and 478.126a reduced in the number of instances from the last investigation, and 478.99(c) increased by <sup>(b)(3)</sup> instance from <sup>(b)(3)</sup> 11/24/2015. In the midst of the violations, the FFL has several standard operating procedures (SOPS) in place that resulted in an significant small error rate of 0.3% based on nearly <sup>(b)(3)</sup> firearm transactions in a 12 month review period. The violation of 27 CFR 478.99(c), warranting revocation, could have been prevented had two employees adhered to the SOP in place for reviewing the ATF Forms 4473, and recording DENIAL on the form.

WC took place 12/22/2016.

Viols WC with WL and Recall

☒ REVIEWED

☒ CONCUR

☒ SEE COMMENTS

☒ FINAL DISPOSITION

SIGNATURE AND TITLE

DDMITCHEL2 - Director, Industry Operations

REVIEW DATE

11/09/2016

#### 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 Ed's Pawn Shop, Inc. Ed's Public Safety	Street Address 4431 N. Henry Boulevard	City Stockbridge	State GA	Zip Code 30281-	County Henry	Page 1 of 9 Pages
License/Permit/Registry Number (If any) 138151027839371		Expiration Date 2/1/2017		Date(s) or Period of Inspection 06/06/2015 through 06/06/2016		

### 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:

Licensee failed to obtain all the information called for in each ATF Form 4473 as indicated by the headings on the form and the instructions on or pertaining to the form on the following (b)(3) 112 ATF Form 4473 transactions:

\* Section C, Items 24 and 25 were blank on ATF Form 4473, Transaction numbers (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)

In future transactions, Licensee shall obtain all the information on each form as indicated by the headings on the form and the instructions on or pertaining to the form. Any corrections attempted shall be conducted in accordance with the instructions on the ATF Form 4473; i.e., make a copy of the inaccurate form and make any necessary additions or revisions to the photocopy. Licensee shall only make corrections in Sections B & D. The Buyer (transferee) shall only make corrections to Sections A & C. Whoever made the changes shall initial and date the changes. The corrected photocopy shall be attached to the original ATF Form 4473 and retained as part of the Licensee's permanent records.

Citation: 27 CFR 478.21(a)



## Report of Violations

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Name of Proprietor Ed's Pawn Shop, Inc. Ed's Public Safety	Street Address 4431 N. Henry Boulevard	City Stockbridge	State GA	Zip Code 30281-	County Henry	Page 2 of 9 Pages
License/Permit/Registry Number (If any) 158151027B39571		Expiration Date 2/1/2017	Date(s) or Period of Inspection 06/06/2015 through 06/06/2016			

### 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:

Licensee failed to obtain a Form 4473 from the transferee showing the transferee's name, sex, residence address (including county or similar political subdivision), date and place of birth; height, weight and race of the transferee; the transferee's county or citizenship; the transferee's INS-issued alien number or admission number; the transferee's State of residence; and certification by the transferee that the transferee is not prohibited by the Act from transporting or shipping a firearm in interstate or foreign commerce or possessing a firearm in or affecting commerce in the following (b)(3) 112 PL ATF Form 4473 transactions:

- Items in Certification Questions 11.b. through 11.i. were blank/incorrect on ATF Form 4473, transaction numbers (b)(3) 112 PL 55 125 STAT 552
- Item 17 was incorrect on ATF Form 4473, transaction numbers (b)(3) 112 PL 55 125 STAT 552 and
- Section A completed by person other than the actual purchaser and only one witness signed on ATF Form 4473, transaction number (b)(3) 112 PL 55 125 STAT 552

Citation: 27 CFR 478.124(c)(1)

#### Date Corrections to be Made:

(If not corrected immediately)

#### Corrective Action to be Taken:

(If not corrected immediately)

In future transactions, Licensee shall obtain completed ATF Forms 4473 with complete transferee information and certification prior to the transfer of a firearm. Any corrections attempted shall be conducted in accordance with the instructions on the ATF Form 4473; i.e., make a copy of the inaccurate form and make any necessary additions or revisions to the photocopy. Licensee shall only make corrections in Sections B & D. The Buyer (transferee) shall only make corrections to Sections A & C. Whoever made the changes shall initial and date the changes. The corrected photocopy shall be attached to the original ATF Form 4473 and retained as part of the Licensee's permanent record.

## Report of Violations

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License/Permit/Registry Number (If any) 15B151027B39571		Expiration Date 2/1/2017	Date(s) or Period of Inspection 06/06/2015 through 06/06/2016			

### 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:

Licensee failed to verify the identity of the transferee by examining the identification document (as defined in section 478.11) presented, and note on the Form 4473 the type of identification used on (b)(3) 112 PL ATF Form 4473 transaction as follows:

**(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)

In the future, the licensee shall verify the identity of the transferee by examining an identification document(s) as defined in section 478.11 and note the type, number, and expiration date on the ATF Form 4473. See ATF Form 4473 instructions to Items 20a & 20b. The identification document(s) shall be valid government-issued photo identification that contains the transferee's name, residence address and date of birth. Licensee may accept a combination of valid government-issued documents to satisfy the identification document requirements.

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

## Report of Violations

### Instructions

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Name of Proprietor Ed's Pawn Shop, Inc. Ed's Public Safety	Street Address 4431 N. Henry Boulevard	City Stockbridge	State GA	Zip Code 30288	County Henry	Page 4 of 9 Pages
License/Permit/Registry Number (If any) 158151027039571		Expiration Date 2/1/2017	Date(s) or Period of Inspection 06/06/2015 through 06/06/2016			

### 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:

Licensee failed to comply with the requirements of 478.102 and record on the form, the date on which the licensee contacted the NICS, as well as, any response provided by the system, including any identification number provided by the system in the following (b)(3) ATF Form 4473 transactions.

- Item 21a. was incorrect on ATF Form 4473, transaction number (b)(3) 112 PL 55
- Item 21c. was blank on ATF Form 4473, transaction number (b)(3) 112 PL 55 and
- Item 21d. was blank/incorrect at time of transfer on ATF Form 4473, transaction numbers (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)

In future transactions, Licensee shall record the date licensee contacted NICS as well as all responses provided by NICS, to include, "No resolution provided within 3 business days" when the initial NICS response is "Delayed". In future transactions, Licensee shall record the date licensee contacted NICS as well as all responses provided by NICS, to include, "No resolution provided within 3 business days" when the initial NICS response is "Delayed". When using the e-Check NICS system, recommend the Licensee print the NICS response and attach it to the ATF Form 4473 particularly when the Licensee chooses to transfer the firearm when no response is provided within the 3-business days.

Citation: 27 CFR 478.12-1(c)(3)(iv)



## Report of Violations

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Name of Proprietor Ed's Pawn Shop, Inc. Ed's Public Safety	Street Address 4431 N. Henry Boulevard	City Stockbridge	State GA	Zip Code 30281-	County Henry	Page 5 of 9 Pages
License/Permit/Registry Number (If any) 158151027939571		Expiration Date 2/1/2017	Date(s) or Period of Inspection 06/06/2015 through 06/06/2016			

### 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:

Licensee failed to meet the requirements for sales or deliveries of firearms on and after November 30, 1998. Specifically, the licensee accepted an expired Georgia permit, which does not qualify as an exception to the NICS background check in the following (b)(3) 112 ATF Form 4473 transaction.

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

Citation: 27 CFR 478.102(a)(1)

#### Date Corrections to be Made:

(If not corrected immediately)

#### Corrective Action to be Taken:

(If not corrected immediately)

In the future, licensee shall comply with the NICS requirements for transactions to individuals or meet the requirements for an exception to the NICS. The only exception to the NICS check in Georgia is a valid Georgia Firearms Carry License.

## Report of Violations

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License/Permit/Registry Number (If any) 138151027B39571		Expiration Date 2/1/2017	Date(s) or Period of Inspection 06/06/2015 through 06/06/2016			

### Inspection Results

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

Number: 6

#### Nature of Violation:

Licensee failed to prepare a report of multiple sales or other disposition whenever the licensee sells or otherwise disposes of, at one time or during any five consecutive business days, two or more pistols, or revolvers, or any combination of pistols and revolvers totaling two or more, to an unlicensed person in the following instances:

#### Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken: Licensee completed and submitted the ATF Forms 3310.4

(If not corrected immediately) during the inspection

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

Citation: 27 CFR 478.126a

## Report of Violations

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License/Permit/Registry Number (if any) 15B151027B39571		Expiration Date 2/1/2017	Date(s) or Period of Inspection 06/06/2015 through 06/06/2016			

### 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:

Licensee sold or delivered a firearm, other than a rifle or shotgun, to a person not licensed under this part and who the licensee knows or has reasonable cause to believe does not reside in the State in which the licensee's place of business or activity is located in the following instances:

#### Date Corrections to be Made:

(If not corrected immediately)

#### Corrective Action to be Taken:

(If not corrected immediately)

In the future, if the buyer is a member of the Armed Forces on active duty acquiring a firearm in the State where his or her permanent duty station is located, but he or she has a driver's license from another State, you should list the buyer's military identification card and official orders showing where his or her permanent duty station is located in response to question 20a.

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

Citation: 27 C.F.R. 478.99(a)



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### 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:

Licensee sold or otherwise disposed of a firearm to a person knowingly or having reasonable cause to believe that such person is within the prohibited categories of persons when the Licensee transferred the firearm after a denied response was provided by the NICS system in the following ATF Form transactions.

#### Date Corrections to be Made:

(If not corrected immediately)

#### Corrective Action to be Taken:

(If not corrected immediately)

In the future, the Licensee shall not transfer a firearm to any person after the NICS system informs the Licensee that the transaction is Denied. Additionally, when using the e-Check NICS system, recommend the Licensee print the NICS response and attach it to the ATF Form 4473 particularly when the Licensee chooses to transfer the firearm when no response is provided within the 3-business days.

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

## Report of Violations

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License/Permit/Registry Number (If any) 158151027839571	Expiration Date 2/1/2017	Date(s) or Period of Inspection 06/06/2015 through 06/06/2016				

### Inspection Results

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

Citation: 27 CFR 478.99(c)

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

GRADY EDWIN TURNER III PRESIDENT

Date  
7.19.16

Signature and Title of ATF Officer

(b) (6)

ATF Investigator

(b) (6)

Date  
7/19/16

For Official Use Only

ATF E-Form 5830  
Revised April 2008



# FIREARMS INSPECTION REPORT

**Name:** Ed's Pawn Shop, Inc.  
**Trade Name:** Ed's Public Safety

**UI#:** 760530-2016-0026 B1B  
**FFL#:** 1-58-151-02-7B-39571

**Address:** 4431 N. Henry Blvd.  
Stockbridge, GA 30281 (Henry County)

## 1 - Introduction

### Inspection Profile:

A query of the Federal Licensing System (FLS) disclosed two Special Attention Flags (SAF) - "Demand Letter 2 (U) and Recall Inspection Recommended (P)". Industry Operations Investigator (IOI) (b)(6) queried N-Force for active investigations associated with the Federal Firearms Licensee (FFL) and/or the address which disclosed none.

On June 6, 2016, IOI (b)(6) initiated a Recall Disposition Emphasis (DE) firearms compliance inspection on Ed's Pawn Shop, Inc, d/b/a Ed's Public Safety at 4431 N. Henry Blvd., Stockbridge, Georgia 30281 (referred to herein as the "Licensee"). IOI (b)(6) inspection team participants and their onsite dates included IOI (b)(6) (June 6-8, 2016), IOI (b)(6) (June 6-8, 2016), IOI (b)(6) (June 6 & 8, 2016), IOI (b)(6) (June 6-7, 2016), IOI (b)(6) (June 6, 2016) and Intern (b)(6) (June 6-9, 14, 2016). Grady Edward (Ed) Turner, CEO/responsible person; Lisa Patrick, Controller/responsible person; (b)(6), Pawn Manager; (b)(6), General Manager were available during the inspection. The inspection period focused on the last 12-months covering the dates June 6, 2015 to June 6, 2016. IOI (b)(6) conducted the onsite inspection on June 6-9, 13-15, 20-23, 27-28, 30, 2016 and concluded the onsite inspection on July 19, 2016 with the closing conference held with the Licensee.

### Business Profile:

The Licensee holds a Type 02 license as a dealer, including pawnbroker, in firearms other than destructive devices. The Licensee has held this license since January 27, 1996. The license is suitable for the type of business conducted. The Licensee also has a current 2016 Special Tax Stamp as a National Firearms Act (NFA) firearms dealer under control number (b)(3) 28 USC 6103.

The Licensee is located in a retail/urban area within the City limits of Stockbridge, Georgia. The Licensee has a City of Stockbridge Occupational Tax Certificate #0002 for the period January 1, 2016 to December 31, 2016. On July 20, 2016, IOI (b)(6) met with (b)(6), Planner/GIS Specialist and (b)(6), Administration & Community Service Director for the City of Stockbridge. Director Hall advised that there are three commercial zones – C1, C2 and C2 and any retail business is permitted in any of those commercial

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zones. The Licensee's property is zoned commercial-C2. The Licensee has a State of Georgia, Department of Revenue, Sales and Use Tax Division, Certificate of Registration under Certificate Number (b)(3) - 26 USC 6103

During the inspection period, the Licensee acquired approximately (b)(4) firearms consisting of approximately (b)(4) (b)(4) handguns & other firearms, and (b)(4) (b)(4) long guns. Of the firearms acquired, approximately (b)(4) (b)(4) were new firearms and (b)(4) (b)(4) were used firearms. The Licensee's primary suppliers of new firearms include (b)(4)

(b)(4). Secondary market firearms are acquired through the general public, pawn, and trade-ins from law enforcement agencies.

The Licensee's customers are the general public, law enforcement, and other FFL's. The Licensee sells new and used firearms. For the period of inspection, the licensee disposed of approximately (b)(4) firearms. Of the firearms disposed, approximately (b)(4) of the firearms business involved wholesale transfers to other licensees and law enforcement departments, (b)(4) percent were retail ATF Form 4473 transactions, and (b)(4) percent were ATF Form 4473 pawn redemptions. Transactions involving NFA firearms accounts for approximately (b)(4) of the Licensee's business.

The Licensee is (b)(4). The Licensee buys used service weapons from law enforcement agencies and provides these agencies credit to buy new service firearms to include NFA firearms. The Licensee will also buy police department seized weapons and provide these departments credit for new firearms and equipment. As a service for these law enforcement agencies, the Licensee destroys any unserviceable weapons (unsafe or altered serial numbers) received from law enforcement agencies through the seizure and condemnation process.

The Licensee conducts internet sales and has two websites, [www.edspawn.com](http://www.edspawn.com) and [www.edspublicsafety.com](http://www.edspublicsafety.com). The latter website is used for the sales of firearms to law enforcement agencies and the general public. The licensee also uses [www.gunbroker.com](http://www.gunbroker.com) for firearm sales. The Licensee makes internet transfers for their customer's.

The Licensee does not conduct business at gun shows. The Licensee does not conduct any manufacturing, importing or gunsmith activity. The Licensee does not sell black powder. No other business is conducted on the premises.



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The Licensee has two (2) offsite storage locations. (b)(6)

Mr. Turner stated that he has them securely stored at this location. He stated that he also has a firearm range at this location to conduct demonstrations for his law enforcement customers. The Licensee also has a warehouse located at 110 Rock Quarry Rd., Stockbridge, GA 30281, which is within walking distance of the Licensee's business premises.

## **Ownership and Control:**

Ed's Pawn Shop, Inc. d/b/a Ed's Public Safety operates as a Domestic For-Profit Corporation in the State of Georgia. The effective date of registration for Ed's Pawn Shop was June 5, 1992. The Licensee was found to be in active compliance with the Georgia Secretary of State's Office. The most recent annual registration (2016) shows Grady E. Turner, III as the CEO, CFO and Secretary of the corporation. Mr. Turner stated that he is the only corporate officer for Ed's Pawn Shop, Inc. and that he owns all of the stock. He further stated that there have been no changes to the corporation in regards to business structure or ownership.

A review of FLS shows Grady Edward Turner, Lisa Patrick, and Danny Burkett as the responsible persons for Ed's Pawn Shop, Inc. Mr. Turner stated that there were no other responsible persons for this FFL. No hidden ownership is suspected. No responsible persons were added or removed from the license.

## **Variance:**

Ed's Pawn Shop does not have any active variances and did not request a variance during the inspection. The Licensee was provided with a copy of ATF Ruling 2016-1 which provides the conditions for maintaining computerized acquisition and disposition records. The Licensee uses the Pawn Master computer software.

## **2 – Recommendation**

Violates DIO Held WC ILO Revocation

According to the Administrative Action Policy, ATF O 5370.1B, paragraph 6(e)(4)(a), the Licensee would merit revocation for the transfer of a firearm to a person knowing or having reason to believe that the transferee is a prohibited. In accordance with ATF O 5370.1B, paragraph 9(a)(2), IOI (b)(6) recommends a warning conference in lieu of revocation based on the following reasons.

- The Licensee was cited for (8) eight violations. The violation for 27 CFR 478.99(c) merits revocation. Of the remaining seven (7) violations, three (3)

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violations merit a report of violations only (27 CFR 478.21(a), 478.124(c)(1), & 478.124(c)(3)(iv); three (3) would merit a warning letter only (27 CFR 478.102(a)(1), 478.124(c)(3)(i) & 478.126a); and one (1) would merit a warning conference (478.99(a)). Two of three that merit warning letter would merit a warning conference based on repeat violations.

- The Licensee conducted approximately (b)(3) - 112 P.001 transactions on ATF Forms 4473 in the 12-month inspection period, a total of (b)(3) ATF Forms 4473 were cited among the eight violations. That is an error rate of 0.3%!
- The Licensee has many standard operating procedures (SOP) in place, such as quarterly inventories and triple reviews of the ATF Form 4473 transactions, designed to promote compliance by reducing the number of errors. The Licensee employs approximately 18 employees, any of which can make a human mistake. At a 0.3% error rate, the Licensee's SOPs work. The 27 CFR 478.99(c) violations occurred due the failure of two (2) long time employees not following the Licensee's SOPs.
- The Licensee timely reported an estimated (b)(3) - 11 multiple sale transactions involving (b)(3) - 11 firearms over the last 12-months.
- The Licensee accounted for all inventory and acquisition and disposition entries during the inspection period. There were approximately (b)(3) - 112 P.001 firearms in inventory, (b)(4) acquisitions and (b)(4) dispositions over the last 12-months.
- The Licensee responded successfully to (b)(3) - 112 firearms trace requests during the 12-month inspection period.

### 3 - Inspection History

The Licensee has had six (6) prior compliance inspections.

<b>Date of Inspection:</b>	January 12, 2015 (Onsite Start Date) / February 17, 2015 (Onsite End Date)
<b>Type of Inspection:</b>	Recall Firearms Compliance Inspection
<b>UI#:</b>	760530-2014-0065 B1B
<b>Inspection Results:</b>	Violations, DIO (or delegate) held Warning Conference ILO Revocation. Report of Violations dated February 17, 2015. Warning Conference held August 10, 2015 followed by a Warning Letter mailed August 11, 2015.
<b>Cited Violations:</b>	27 CFR 478.125(e) – Licensee failed to record the disposition of (b)(3) 112 PL SS 12 firearms in the Acquisition and Disposition Record;  27 CFR 478.124(c)(1) – Licensee failed to have the transferee accurately complete Section A of the ATF Form 4473, prior to the transfer of a firearm on (b)(3) ATF Forms 4473 (REPEAT of violation cited 02/24/09 & 03/08/11);

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27 CFR 478.124(c)(3)(i) – Licensee failed to record on the ATF Form 4473 the identification document used to establish the place of residence of the transferee in (b)(3) instances (REPEAT of violation cited 02/24/09 & 03/08/11);

27 CFR 478.124(c)(3)(iv) – Licensee failed to comply with the requirements of 27 CFR 478.102 and record on the ATF Form 4473 the date the transferee's identifying information in Section A was transmitted to NICS, and/or the response initially provided by NICS, and/or the response provided if the initial response was "delayed" on (b)(3) ATF Forms 4473 (REPEAT of violation cited 03/08/11);

27 CFR 478.124(c)(5) – Licensee failed to record the date or record the correct date on (b)(3) ATF Forms 4473;

27 CFR 478.126a – Licensee failed to timely submit a report of multiple sale (ATF Form 3310.4) no later than the close of business on the day that the multiple sale or other disposition occurs in (b)(3) instances (REPEAT of violation cited 03/08/11); and

27 CFR 478.21(a) – Licensee failed to furnish all of the information called for in each form as indicated by the headings on the form and the instructions on or pertaining to the form on (b)(3) ATF Forms 4473 (REPEAT of violation cited 02/24/09 & 03/08/11).

Date of Inspection: February 7-18 & March 8, 2011  
Type of Inspection: Firearms Disposition Emphasis (DE) Inspection  
UI#: 771030-2011-0022 B1B  
Inspection Results: Violations, Warning Conference with Warning Letter and Recall Inspection. Report of Violations dated March 8, 2011. Warning Conference held July 13, 2011 followed by Warning Letter dated January 13, 2011.  
Cited Violations: 27 CFR 478.21(a) - Licensee failed to furnish the information called for in each form as indicated by the headings and instructions on or pertaining to the form on (b)(3) ATF Forms 4473 transactions (REPEAT of violation cited 02/24/09);

27 CFR 478.99(c) - Licensee transferred a firearm to a person knowing or having reasonable cause to believe that such



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person was prohibited on (b)(3) 11/2 PL 55/1 ATF Form 4473 transaction where the transferee answered "yes" to question 11.i. (REPEAT of violation cited 11/20/07);

27 CFR 478.124(c)(1) – Licensee failed to obtain complete and accurate information and certification from the buyer/transferee prior to making an over-the-counter transfer of a firearm to a nonlicensee on (b)(3) 11/2 PL 55/12 ATF Forms 4473 transactions (REPEAT of violation cited 02/24/09);

27 CFR 478.124(c)(3)(i) - Licensee failed to verify the identity of the transferee by examining the identification document presented, and noting on (b)(3) 11/2 PL 55/1 ATF Form 4473 the type of identification used (REPEAT of violation cited 02/24/09);

27 CFR 478.124(c)(3)(iv) - Licensee failed to comply with the requirements of 478.102 and record on the form the date on which the licensee contacted the NICS, as well as any response provided by the system on (b)(3) 11/2 PL 55/1 ATF Form 4473 transaction; and.

27 CFR 478.126a - Licensee failed to report multiple sales or other disposition of pistols and revolvers not later than the close of business on the day that the multiple sale or other disposition occurred on (b)(3) 11/2 PL 55/12 ATF Forms 4473 transactions.

Date of Inspection: February 1-4, 11, 2010  
Type of Inspection: Recall Compliance Inspection  
UI#: 771030-2010-0027 B1B  
Inspection Results: No violations, No Further Action, No referrals  
Cited Violations: No violations

Date of Inspection: January 12, 2009 (Onsite Start Date)  
Type of Inspection: Recall Compliance Inspection  
UI#: 771030-2009-0090 B1B  
Inspection Results: Violations, ROV Only and Recall Violations. Report of Violations dated February 24, 2009.  
Cited Violations: 27 CFR 478.124(c)(1) - The licensee failed to obtain ATF Forms 4473 containing all the information in Section A & Section C as indicated by the headings and instructions on the form on (b)(3) 11/2 PL 55/129 instances.

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27 CFR 478.124(c)(3)(i) - The licensee failed to examine and note sufficient form(s) of identification to verify the purchaser's residence address as shown on Item 2 of ATF Forms 4473 in (b)(3) instances. In one of the (b)(3) instances, (b)(3) 112 PL 95 125 S1 driver's license was accepted although it was expired at the time of the sale or transfer.

27 CFR 478.21a - The licensee failed to state the correct date(s) of transfer on ATF Form 4473 in (b)(3) 112 PL 95 125 S1 instances; and (b)(3) 112 PL 95 125 S1 Form 4473 had an incorrect date of purchaser's certification. The information required by the headings and instructions on ATF Forms 4473 were listed inaccurately.

27 CFR 478.129 - The licensee failed to retain ATF Forms 4473 separately by date of certification or alphabetically wherein the sale or other disposition did not take place.

Date of Inspection: January 12, 2009  
Type of Inspection: Forward Trace Initiative  
UI#: 771030-2009-0127 B1B  
Inspection Results: Special Request Completed  
Cited Violations: No Violations

Date of Inspection: November 15, 2007 (Onsite Start Date) / November 20, 2011 (Onsite End Date)  
Type of Inspection: Firearms Compliance Inspection  
UI#: 771030-2008-0179 B1B  
Inspection Results: Violations, Warning Conference with Warning Letter and Recall Inspection. Report of Violations dated November 20, 2007. Warning Conference held July 22, 2008 followed by Warning Letter dated July 28, 2008.  
Cited Violations: 27 CFR 478.99(c) - The Licensee Transferred (b)(3) (b)(3) 112 PL 95 125 S1  
(b) (6) was denied on 02/09/07 pending a delayed NICS response. The transfer was completed on 02/10/07.

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

The Licensee uses the Pawn Master program for their computerized acquisition and disposition (A&D) records. The A&D record was found to be in the proper format. The Licensee was found to be maintaining their computerized A&D records in

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accordance with the criteria provided in ATF Ruling 2016-1. The Licensee generated an A&D record report in PDF format and saved it on a USB flash drive for use during the inspection.

Industry Operations Investigator (IOI) (b)(6) IOI (b)(6) IOI (b)(6) IOI (b)(6) IOI (b)(6) IOI (b)(6) and ATF Intern (b)(6) conducted a full inventory of firearms which included 3,826 firearms, of which (b)(3) - 26 USC 6103 IOI (b)(6) traced the firearms to the Acquisition and Disposition (A&D) records disclosing no discrepancies.

IOI (b)(6) did not trace a sample of firearms through the records from their acquisition to their disposition due to the unsearchable nature of the PDF format in which the A&D record was received for review during the inspection.

The Licensee's standard operating procedures (SOP) relevant to the A&D record and inventory includes the following measures. The Licensee maintains computerized A&D records, but also maintains A&D record books for the NFA firearms as a backup record. There are approximately 18 employees who are responsible for making entries in the A&D record. The Licensee uses a computer generated inventory control number which is printed on a tag and attached to the firearm. The Licensee takes inventory on a quarterly basis. The inventory is conducted on a Sunday when the store is closed. The inventory is conducted by scanning the bar code on each firearm identification tag. The Pawn Master program compares the data scanned with the A&D record and then generates a discrepancy report. All discrepancies are then immediately reconciled. The Licensee's last inventory was conducted the week prior to the start of this inspection. All handguns are in a locked gun cabinet and the long guns are behind the counter on gun racks. Surplus firearm stock is kept in a large vault in the back of the store and/or at the off-site warehouse. The business security includes cameras, a barred gate in front of the main door, and an alarm system monitored by Stockbridge Police Department.

The Violent Crime Analysis Branch (VCAB) FFL history received for the 3-year period covering February 1, 2013 to February 5, 2016 reported zero (0) theft or loss reports. IOI (b)(6) did not identify any trafficking issues, obliterated serial numbers, or illegal firearms.

## 5 - ATF Forms 4473 – NICS & Other Dispositions

There were approximately (b)(3) - 112 PUF ATF Forms 4473 on file and reviewed for the inspection period. Following is the breakdown by Industry Operations Investigator (IOI) of the approximate number of forms each reviewed - IOI (b)(6) reviewed (b)(3) - 112 PUF ATF Forms 4473, IOI (b)(6) reviewed (b)(3) - 112 PUF ATF Forms 4473, IOI (b)(6) reviewed 227 ATF Forms 4473, IOI (b)(6) reviewed (b)(3) - 112 PUF ATF Forms 4473, and Intern (b)(3) - 112 PUF reviewed (b)(3) - 112 PUF ATF Forms 4473. The Licensee also had (b)(3) - 112 PUF transactions involving the transfer of (b)(3) - 112 PUF firearms to other licensees and law enforcement agencies during the inspection period accounting for (b)(3) - 112 PUF the Licensee's dispositions. The dealer and



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law enforcement agency transactions were properly conducted and recorded in the A&D record. The inspection team identified the following violations resulting from the ATF Form 4473 review.

The Licensee failed to obtain the re-certification in Section C required when the transfer of the firearm takes place on a different day from the day the transferee completed Section A of (b)(3) 112 PL SS 125 ATF Forms 4473, in violation of 27 CFR 478.21(a). IOI (b)(6) conducted NCIC criminal records checks on the purchases disclosing no prohibiting criminal records. **(Report of Violations-Violation 1, Worksheet 2, Exhibit 1)**

The Licensee failed to obtain the required transferee (buyer) information and/or complete certification on (b)(3) 112 PL SS 125 ATF Forms 4473, in violation of 27 CFR 478.124(c)(1). IOI (b)(6) and IOI (b)(6) conducted NCIC criminal records checks on the purchasers disclosing (b)(3) 112 PL SS 11 prohibited purchaser. **(Report of Violations-violation 2, Worksheet 2, Exhibit 2, Referral of Information, Number: 2016-0029)**

The Licensee failed to verify the identity of the transferee by examining the identification document (as defined in section 478.11) presented, and note on the Form 4473 the type of identification used in (b)(3) 112 PL SS 11 ATF Form 4473 transaction, in violation of 27 CFR 478.124(c)(3)(i). IOI (b)(6) identified this individual as a prohibited person. **(Report of Violations-violation 3, Worksheet 2, Exhibit 3, Referral of Information Number 2016-0029)**

The Licensee failed to record the NICS contact Date, the NICS response(s) and/or the NICS transaction number (NTN) on (b)(3) 112 PL SS 12 ATF Form 4473 transactions, in violation of 27 CFR 478.124(c)(3)(iv). IOI (b)(6) conducted an NCIC query on the purchasers disclosing (b)(3) 112 PL SS 11 prohibiting criminal record. **(Report of Violations-violation 4, Worksheet 2, Exhibit 4, Referral Number: 2016-0037)**

The Licensee failed to contact the NICS system before the completion of the transfer of the firearm when the licensee accepted a permit that did not qualify as an exception to the NICS in (b)(3) 112 PL SS 11 instance, in violation of 27 CFR 478.102(a)(1). IOI (b)(6) conducted an NCIC query on the purchaser disclosing no prohibiting criminal record. **(Report of Violations-violation 5, Worksheet 2, Exhibit 5)**

The Licensee failed to submit an ATF F 3310.4 for (b)(3) 112 PL SS 125 multiple handguns sales, in violation of 27 CFR 478.126a. **(Report of Violations-violation 6, Worksheet 2, Exhibit 6)**

The Licensee sold a handgun to an unlicensed out-of-State resident, where the purchaser presented military orders which did not satisfy the residency requirement in (b)(3) 112 PL SS 125 instances, in violation of 27 CFR 478.99(a). IOI (b)(6) conducted NCIC criminal



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records checks disclosing no prohibiting criminal records. **(Report of Violations-violation 7, worksheet 2, Exhibit 7).**

The licensee transferred firearms to persons who the licensee had reasonable cause to believe were prohibited when the Licensee transferred a firearm to a person after the Licensee received a denied response from the NICS system in (b)(3) 112 PL 55 12 instances, in violation of 27 478.99(c). IOI (b)(6) conducted NCIC criminal records queries disclosing prohibiting criminal records. IOI (b)(6) submitted Referrals of Information on the (b)(3) 112 PL 55 12 prohibited persons. **(Report of Violations-violation 8, Worksheet 2, Exhibit 8, Referral of Information, Numbers 2016-0028 & 2016-0029)**

IOI (b)(6) received the NICS Audit Log received listing denied status transactions for the period 11/30/98 to 02/04/16 and non-denied status transactions for the 60-day period 12/06/15 to 02/04/16. IOI (b)(6) and IOI (b)(6) verified the 722 non-denied transactions reported for the requested period. IOI (b)(6) and IOI (b)(6) verified the 39 denied transactions on file for the inspection period. IOI (b)(6) disclosed that the Licensee transferred a firearm to the purchaser after the Licensee received a denied response from the NICS system in (b)(3) 112 PL 55 12 instances, in violation of 27 CFR 478.99(c). **(Report of Violations-violation 8, Worksheet 2, Exhibit 8, Referral of Information, Numbers 2016-0028 & 2016-0029).**

The Licensee's standard operating procedures (SOP) relevant to the ATF Forms 4473 completion and other dispositions includes the following measures. The Licensee has approximately 18 employees that handle the firearms transactions. The Licensee files the forms numerically. The Licensee also assigns a transaction number to the dealer and law enforcement department transactions which are filed among the ATF Forms 4473. The Licensee has a triple check review of the ATF Forms 4473. The ATF Form 4473 is reviewed at the time the transaction occurs, at the end of the day, and a final review before the ATF Forms 4473 are filed. After each review, the Licensee's employee conducting the review initials and dates the forms. The Licensee attaches copies of the transferee's identification document(s) and, if applicable, their Georgia firearms carry permit. The Licensee's computer program is designed to "Flag" any multiple sale of a firearm (handgun or long gun) to the same customer within five (5) days. The employee will complete a multiple sale form immediately for a multiple handgun transaction and submit the form to ATF. At the end of the night, the manager will verify that all multiple sales were submitted. The Licensee will begin to create a report of all firearm sales for the last five (5) days to double check that no multiple sales of handguns to the same purchaser were missed. The Licensee will start printing and attaching the e-NICS responses to the ATF Form 4473, especially when the firearm will be transferred when no response is received from the NICS system within the three (3) business days.

### **6 - Multiple Sales**



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The Violent Crime Analysis Branch (VCAB) FFL history received for the 3-year period covering February 1, 2013 to February 5, 2016 reported (b)(3)-11 multiple handgun sales. IOI (b)(6) identified (b)(3) 112 PL 55 125 S1 multiple handgun sales involving (b)(3) 112 PL 55 12 firearms that the Licensee did not report, in violation of 27 CFR 478.126a. **(Report of Violations-violation 6, Worksheet 2, Exhibit 6)**

## 7 - Suspicious/Prohibited Purchasers

Industry Operations Investigator (IOI) (b)(6) conducted NCIC/e-Trace queries on the two (2) NICS denied transferees confirming their prohibited status. **(Referral of Information, Numbers (b)(3) 112 PL 55 125 STAT 552)**. IOI (b)(6) conducted NCIC/e-Trace queries on 52 transferees disclosing (b)(3) 112 prohibiting criminal record. IOI (b)(6) queried the purchaser and the firearm in the e-Trace system disclosing no other traces to this individual. However, the firearm was the subject of a firearm trace subsequent to the purchase. **(Referral of Information, Number: 2016-0037)**. IOI (b)(6) also identified a suspicious transaction which (b)(7)(E). **(Referral of Information, Number 2016-0038)**.

## 8 - Trace Activity

The Violent Crime Analysis Branch (VCAB) FFL history received for the 3-year period covering February 1, 2013 to February 5, 2016 reported the Licensee was associated with (b)(3) 112 firearm trace requests, of which (b)(3) 112 were within the 12-month inspection period. The licensee successfully responded to the trace requests within the inspection period. Industry Operations Investigator (IOI) (b)(6) obtained transaction information on (b)(3) 112 PL 55 12 unsuccessful traces with a Disposition Code (b)(3) - 112 Public Law which occurred outside the inspection period. It appears the traces were unsuccessful due to discrepancies between the serial number of the firearm recorded by the Licensee and the serial number supplied by the supplier of the firearm. On August 11, 2016, IOI (b)(6) forwarded the trace information to the National Tracing Center via email (b)(6) (b)(6)@atf.gov). The Licensee acquired approximately (b)(4) used firearms and disposed of approximately (b)(4) used firearms during the inspection period. IOI (b)(6) conducted NCIC and e-Trace queries on a sample of 24 secondary market firearms disclosing no stolen or trace reports. IOI (b)(6) disclosed (b)(3) 112 PL 55 12 suspicious firearm reported as a suspect firearm under criminal enforcement case number 760545-15-0024. IOI (b)(6) reviewed the criminal enforcement case information and determined there was no new information to refer to the case agent. IOI (b)(6) conducted NCIC and e-Trace queries on an additional sample of 58 firearms disclosing no stolen firearms or suspicious firearm reports. IOI (b)(6) disclosed (b)(3) 112 PL 55 12 firearm trace report which is included in Referral of Information, Number 2016-0037.

## 9 - NFA/Importer/Collector/Manufacturer

The licensee is a registered (b)(3) - 26 USC 6103, (b)(6)

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corresponding entry in the acquisition and disposition (A&D) record. (b)(3) - 26 USC 6103  
[REDACTED] in inventory disclosing no discrepancies.

IOI (b)(3) - 26 USC 6103, (b)(6)  
[REDACTED]

The licensee does not conduct activities as a Manufacturer, Importer or Collector at this time.

### 10 – Referrals

Industry Operations Investigator (IOI) (b)(6) identified (b)(3) 112 PL 55 125 STAT 552 prohibited persons whereby the Licensee transferred firearms to each person after receiving a denied response from the NICS system. IOI (b)(6) identified a prohibited person whereby the Licensee transferred a firearm to a person after no response was received from the NICS system within the 3-business days. IOI (b)(6) also prepared a suspicious transaction referral of information on (b)(7)(E) [REDACTED] IOIs (b)(6) and (b)(6) generated the Referrals of Information which were forwarded to the ATF Atlanta Field Intelligence Group (FIG) for further action.

**Referral Number 2016-0028:** On December 26, 2015, (b)(3) 112 PL 55 125 STAT 552 completed an ATF Form 4473 (transaction #16-0001) to purchase (b)(3) 112 PL 55 125 STAT 552 [REDACTED]. (b)(6) recorded a "NO" response to question 11.c., "Have you ever been convicted in any court of a felony, or any other crime, for which the judge could have imprisoned you for more than one year, even if you received a shorter sentence including probation?" On December 26, 2015, the Licensee contacted the NICS system and NICS provided a "delayed" response to the Licensee with a Missing Disposition Information (MDI) date of December 31, 2015. On December 31, 2015, NICS contacted the Licensee via telephone and advised them the transaction was denied (NICS transaction number (b)(3) 112 PL 55 125 STAT 552). The Licensee recorded the denied response on the ATF Form 4473. ON January 2, 2016, the Licensee transferred the handgun to (b)(6).

**Referral Number 2016-0028:** (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)  
[REDACTED]

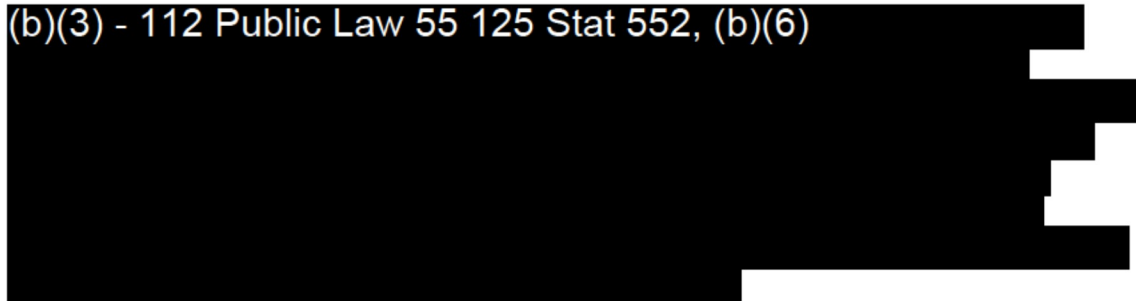


## FIREARMS INSPECTION REPORT

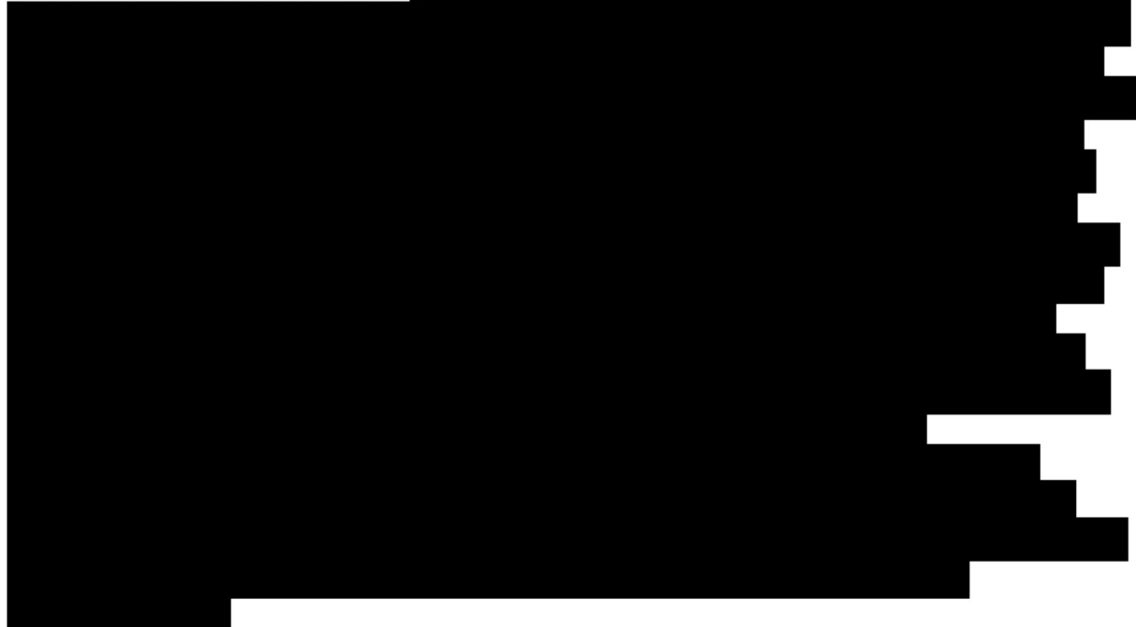
**Name:** Ed's Pawn Shop, Inc.  
**Trade Name:** Ed's Public Safety

**UI#:** 760530-2016-0026 B1B  
**FFL#:** 1-58-151-02-7B-39571


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



**Referral Number 2016-0037:** (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6), (b)(7)(C)



**Referral Number 2016-0038:** (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6), (b)(7)(E)



### **11 - Other**

The Licensee prominently displayed the Youth Handgun Safety Act poster and made the written Notices available at the sales counter. The Licensee is aware of the

# FIREARMS INSPECTION REPORT

Name: Ed's Pawn Shop, Inc.  
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requirement to make secure gun locks and/or safety devices available to the consumer, as well as, for all handgun transactions to non-licensees.

The Licensee is associated with two other Federal Firearms Licensees (FFL) - Stockbridge Sales Company, d/b/a Emergency Pawn Shop, Conyers, GA. (FFL: 1-58-09079) and Ed's Public Safety, Inc., Stockbridge, GA (FFL: 1-58-12396). Ed's Public Safety, Inc. received its FFL on August 3, 2016. Grady Edwin (Ed) Turner is the CEO/CFO/Secretary of both FFL businesses. Mr. Turner stated that the purpose of the new FFL is to separate Ed's Public Safety's wholesale sale of firearms to dealers and government/law enforcement agencies from the retail sale of firearms and the pawnbroker dealings with the general public.

## 12 - Closing Actions

On July 19, 2016, Industry Operations Investigator (IOI) (b)(6) held a closing conference with the Licensee represented by Ed Turner, CEO/responsible person, Lisa Patrick, Controller/responsible person, (b)(6), Pawn Manager, (b)(6), General Manager, and five of the sales associates to review and discuss the results of the inspection. IOI (b)(6) reviewed the violations cited on the Report of Violations and the corrective action to be taken. Mr. Turner signed the Report of Violations acknowledging this review and receipt of the report. IOI (b)(6) reviewed the Acknowledgement of Federal Firearms Regulations with Mr. Turner who subsequently signed the reference guide. (Exhibit 9)

IOI (b)(6) also reviewed the Important Notice: Selling Firearms AFTER Revocation, Expiration or Surrender of an FFL, the Advisory – Telephone Fraud Scheme Used to Request Money to Transfer Firearms, and the Loss Prevention for Firearms Retailers pamphlet.

IOI (b)(6) provided the Licensee with the following materials:

### ATF Publications

- Advised the Applicant where to obtain a copy of the 2012 Federal Firearms Regulations Reference Guide (ATF P 5300.4)
- Loss Prevention for Firearms Retailers (ATF P 5380.1)

ATF Rulings: 2016-1

### Open Letters

- NOTICE - Selling Firearms after Revocation, Expiration or Surrender of FFL
- Advisory – Telephone Fraud Scheme Used to Request Money to Transfer Firearms – March 21, 2016

### Miscellaneous

- Important ATF Phone Numbers

## 13 - Violations

# FIREARMS INSPECTION REPORT

Name: Ed's Pawn Shop, Inc.  
Trade Name: Ed's Public Safety

UI#: 760530-2016-0026 B1B  
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1. 27 CFR 478.21(a)  
"REPEAT OF VIOLATION CITED ON FEBRUARY 17, 2015, MARCH 8, 2011, AND FEBRUARY 24, 2009."

Nature of Violation: Licensee failed to obtain all the information called for in each ATF Form 4473 as indicated by the headings on the form and the instructions on or pertaining to the form on the following (b)(3) 112 PL 55 125 S ATF Form 4473 transactions.

- Section C, Items 24 and 25 were blank on ATF Form 4473, Transaction numbers (b)(3) 112 PL 55 125 STAT 552.

Licensee's Response: The Licensee (Ed Turner) stated that he has triple checks in place and does not know what else he can do. Mr. Turner stated, "We're going to make mistakes."

Corrective Action: In future transactions, Licensee shall obtain all the information on each form as indicated by the headings on the form and the instructions on or pertaining to the form. Any corrections attempted shall be conducted in accordance with the instructions on the ATF Form 4473; i.e., make a copy of the inaccurate form and make any necessary additions or revisions to the photocopy. Licensee shall only make corrections in Sections B & D. The Buyer (transferee) shall only make corrections to Sections A & C. Whoever made the changes shall initial and date the changes. The corrected photocopy shall be attached to the original ATF Form 4473 and retained as part of the Licensee's permanent records.

(Reference: Worksheet 2-4473(2012 edition), Exhibit 1)

2. 27 CFR 478.124(c)(1)  
"REPEAT OF VIOLATION CITED ON FEBRUARY 17, 2015, MARCH 8, 2011, AND FEBRUARY 24, 2009."

Nature of Violation: Licensee failed to obtain a Form 4473 from the transferee showing the transferee's name, sex, residence address (including county or similar political subdivision), date and place of birth; height, weight and race of the transferee; the transferee's county or citizenship; the transferee's INS-issued alien number or admission number; the transferee's State of residence; and certification by the transferee that the transferee is not prohibited by the Act from transporting or shipping a firearm in interstate or foreign commerce or possessing a firearm in or affecting commerce in the following (b)(3) 112 PL 55 125 S ATF Form 4473 transactions.

- Items in Certification Questions 11.b through 11.l were blank/incorrect on ATF Form 4473, transaction numbers (b)(3) 112 PL 55 125 STAT 552; (b)(3) 112 PL 55 125 S
- Item 17 was incorrect on ATF Form 4473, transaction numbers (b)(3) 112 PL 55 125 STAT 552; and

## FIREARMS INSPECTION REPORT

Name: Ed's Pawn Shop, Inc.  
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- Section A completed by person other than the actual purchaser and only one witness signed on ATF Form 4473, transaction number (b)(3) 112 PL 55 125.

Licensee's Response: The Licensee (Ed Turner) stated that he has triple checks in place and does not know what else he can do. Mr. Turner stated, "We're going to make mistakes."

Corrective Action: In future transactions, Licensee shall obtain completed ATF Forms 4473 with complete transferee information and certification prior to the transfer of a firearm. Any corrections attempted shall be conducted in accordance with the instructions on the ATF Form 4473. The Licensee shall make a copy of the inaccurate form and make any necessary additions or revisions to the photocopy. Licensee shall only make corrections in Sections B & D. The Buyer (transferee) shall only make corrections to Sections A & C. Whoever made the changes shall initial and date the changes. The corrected photocopy shall be attached to the original ATF Form 4473 and retained as part of the Licensee's permanent records.

(Reference: Worksheet 2-4473(2012 edition), Exhibit 2)

3. 27 CFR 478.124(c)(3)(i)  
"REPEAT OF VIOLATION CITED ON FEBRUARY 17, 2015, MARCH 8, 2011, AND FEBRUARY 24, 2009."

Nature of Violation: Licensee failed to verify the identity of the transferee by examining the identification document (as defined in section 478.11) presented, and note on the Form 4473 the type of identification used on (b)(3) 112 PL 55 125 ATF Form 4473 transaction as follows.

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

Licensee's Response: The Licensee (Ed Turner) stated that he has triple checks in place and does not know what else he can do. Mr. Turner stated, "We're going to make mistakes."

Corrective Action: In the future, the licensee shall verify the identity of the transferee by examining an identification document(s) as defined in section 478.11 and note the type, number, and expiration date on the ATF Form 4473. See ATF Form 4473 instructions to Items 20a & 20b. The identification document(s) shall be valid government-issued photo identification that contains the transferee's name, residence address and date of birth. Licensee may accept a combination of valid government-issued documents to satisfy the identification document requirements.

(Reference: Worksheet 2-4473(2012 edition), Exhibit 3)



## FIREARMS INSPECTION REPORT

**Name:** Ed's Pawn Shop, Inc.  
**Trade Name:** Ed's Public Safety

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4. **27 CFR 478.124(c)(3)(iv)**  
**"REPEAT OF VIOLATION CITED ON FEBRUARY 17, 2015, FEBRUARY 7, 2011."**

**Nature of Violation:** Licensee failed to comply with the requirements of 478.102 and record on the form, the date on which the licensee contacted the NICS, as well as, any response provided by the system, including any identification number provided by the system in the following (b)(3) 112 PL 55 12 ATF Form 4473 transactions.

- Item 21a was incorrect on ATF Form 4473, transaction number (b)(3) 112 PL 55 125 ;
- Item 21c was blank on ATF Form 4473, transaction number (b)(3) 112 PL 55 125 ; and
- Item 21d was blank/incomplete at time of transfer on ATF Form 4473, transaction numbers (b)(3) 112 PL 55 125 STAT 552.

**Licensee's Response:** The Licensee (Ed Turner) stated that he has triple checks in place and does not know what else he can do. Mr. Turner stated, "We're going to make mistakes." Mr. Turner stated that they would print the NICS e-Check results on any transactions where no resolution was provided within 3 days by the NICS system and attach the printout to the ATF Form 4473.

**Corrective Action:** In future transactions, Licensee shall record the date licensee contacted NICS as well as all responses provided by NICS, to include, "No resolution provided within three (3) business days" when the initial NICS response is "Delayed". When using the e-Check NICS system, recommend the Licensee print the NICS response and attach it to the ATF Form 4473 particularly when the Licensee chooses to transfer the firearm when no response is provided within the three (3) business days.

**(Reference: Worksheet 2-4473(2012 edition), Exhibit 4)**

5. **27 CFR 478.102(a)(1)**

**Nature of Violation:** Licensee failed to meet the requirements for sales or deliveries of firearms on and after November 30, 1998. Specifically, the licensee accepted an expired Georgia permit, which does not qualify as an exception to the NICS background check in the following (b)(3) 112 PL 55 12 ATF Form 4473 transaction.

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

**Licensees Response:** The Licensee (Ed Turner) stated that he has triple checks in place and does not know what else he can do. Mr. Turner stated, "We're going to make mistakes."

## FIREARMS INSPECTION REPORT

Name: Ed's Pawn Shop, Inc.  
Trade Name: Ed's Public Safety

UI#: 760530-2016-0026 B1B  
FFL#: 1-58-151-02-7B-39571

Corrective Action: In the future, licensee shall comply with the NICS requirements for transactions to individuals or meet the requirements for an exception to the NICS. The only exception to the NICS check in Georgia is a valid Georgia Firearms Carry License. (Reference: Worksheet 2-4473(2012 edition), Exhibit 5)

6. 27 CFR 478.126a  
"REPEAT OF VIOLATION CITED ON FEBRUARY 17, 2015 AND MARCH 8, 2011."

Nature of Violation: Licensee failed to prepare a report of multiple sales or other disposition whenever the licensee sells or otherwise disposes of, at one time or during any five consecutive business days, two or more pistols, or revolvers, or any combination of pistols and revolvers totaling two or more, to an unlicensed person in the following <sup>(b)(3) 112 PL 55 125 STAT 552</sup> instances.

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

Licensee's Response: The Licensee (Ed Turner) stated that he has triple checks in place and does not know what else he can do. Mr. Turner stated, "We're going to make mistakes." The Licensee stated that the Pawn Master system notifies the user of a multiple handgun transaction, but these were missed.

Corrective Action: Licensee completed and submitted the ATF Forms 3310.4 during the inspection. Industry Operations Investigator <sup>(b)(6)</sup> queried e-Trace and verified the receipt of the multiple sale reports. (Reference: Worksheet 2-4473(2012 edition), Exhibit 6)

7. 27 CFR 478.99(a)

Nature of Violation: Licensee sold or delivered a firearm, other than a rifle or shotgun, to a person not licensed under this part and who the licensee knows or has reasonable cause to believe does not reside in the State in which the licensee's place of business or activity is located in the following <sup>(b)(3) 112 PL 55 125 STAT 552</sup> instances.

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

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Name: Ed's Pawn Shop, Inc.  
Trade Name: Ed's Public Safety

UI#: 760530-2016-0026 B1B  
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(b)(3) 112 PL 55 125 STAT 552

Licensee's Response: The Licensee (Ed Turner) stated that he has triple checks in place and does not know what else he can do. Mr. Turner stated, "We're going to make mistakes." After reviewing the transactions, Mr. Turner asked, "How are we supposed to know if the government does not know?" IOI (b)(6) suggested that if they have any doubt of the sufficiency of the military orders to establish active duty and permanent change of station orders, do not go through with the transaction.

Corrective Action: In the future, if the buyer is a member of the Armed Forces on active duty acquiring a firearm in the State where his or her permanent duty station is located, but he or she has a driver's license from another State, the Licensee should list the buyer's military identification card and official orders showing where his or her permanent duty station is located in response to question 20a.

(Reference: Worksheet 2-4473(2012 edition), Exhibit 7)

8. 27 CFR 478.99(c)  
"REPEAT OF VIOLATION CITED ON MARCH 8, 2011 AND NOVEMBER 20, 2007."

Nature of Violation: Licensee sold or otherwise disposed of a firearm to a person knowingly or having reasonable cause to believe that such person is within the prohibited categories of persons when the Licensee transferred the firearm after a denied response was provided by the NICS system in the following (b)(3) 112 PL 55 125 ATF Form transactions.

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

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**Name:** Ed's Pawn Shop, Inc.  
**Trade Name:** Ed's Public Safety

**UI#:** 760530-2016-0026 B1B  
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(b)(3) 112 PL 55 125 STAT 552

**Licensee's Response:** The Licensee (Ed Turner) stated that he has triple checks in place and does not know what else he can do. Mr. Turner stated, "We're going to make mistakes." Mr. Turner stated that their standard operating procedures (SOP) for denials is to mark the ATF Form 4473 with "DENIED" in red ink. That SOP was not followed because the transaction occurred during their annual sales event, consequently, the reviewer missed the denial because it was not in red. Mr. Turner could not explain the other denial. Mr. Turner stated that their new SOP is to print the NICS e-Check results on any transactions where no resolution was provided within three (3) days by the NICS system and attach the printout to the ATF Form 4473.

**Corrective Action:** In the future, the Licensee shall not transfer a firearm to any person after the NICS system informs the Licensee that the transaction is Denied. Additionally, when using the e-Check NICS system, recommend the Licensee print the NICS response and attach it to the ATF Form 4473 particularly when the Licensee chooses to transfer the firearm when no response is provided within three (3) business days.

**(Reference: Worksheet 2-4473(2012 edition), Exhibit 8, Referral of Information, Numbers: 2016-0028 & 2016-0029)**

X

(b)(6)

Industry Operations Investigator



# FIREARMS INSPECTION REPORT

**Name:** Ed's Pawn Shop, Inc.  
**Trade Name:** Ed's Public Safety

**UI#:** 760530-2016-0026 B1B  
**FFL#:** 1-58-151-02-7B-39571

## Index of Worksheets and Exhibits

### Worksheets

- Informational Page
- Worksheet 2-4473(2012 edition)
- Statistical page

### Exhibits

1. Photographs of (b)(3) 112 PL 55 125 5 ATF Forms 4473, transaction numbers (b)(3) 112 PL 55 125 STAT 552 - (Documents the violation of 27 CFR 478.21(a))
2. Photograph of (b)(3) 112 PL 55 125 ATF Forms 4473, transaction numbers (b)(3) 112 PL 55 125 STAT 552 - (Documents the violation of 27 CFR 478.124(c)(1))
3. Photograph of (b)(3) 112 PL 55 1 ATF Form 4473, transaction number (b)(3) 112 PL 55 125 - (Documents the violation of 27 CFR 478.124(c)(3)(i))
4. Photograph of (b)(3) 112 PL 55 12 ATF Forms 4473, transaction numbers (b)(3) 112 PL 55 125 STAT 552 (Documents the violation of 27 CFR 478.124(c)(3)(iv))
5. Photograph of (b)(3) 112 PL 55 1 ATF Form 4473, transaction number (b)(3) 112 PL 55 125 - (Documents the violation of 27 CFR 478.102(a)(1))
6. Photograph of (b)(3) 112 PL 55 ATF Forms 4473 pertaining to the multiple hand guns transactions involving (b)(6) (b)(3) 112 PL 55 125 STAT 552 with the corrected reporting of the multiple hand gun transaction. (Documents the violation of 27 CFR 478.126a).
7. Photograph of (b)(3) 112 PL 55 12 ATF Forms 4473, transaction numbers (b)(3) 112 PL 55 125 STAT 552 - (Documents the violation of 27 CFR 478.99(a))
8. Photograph of (b)(3) 112 PL 55 12 ATF Forms 4473, transaction numbers (b)(3) 112 PL 55 125 STAT 552 and the FFL NICS audit log entries of these denials - (Documents the violation of 27 CFR 478.99(c))
9. Acknowledgement of Federal Firearms Regulations Guide



U.S. Department of Justice

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

[www.atf.gov](http://www.atf.gov)

DEC 20 2016

760530: (b)(6)  
5373

Mr. Grady Edward Turner, CEO  
Ed's Pawn Shop, Inc.  
Ed's Public Safety  
4431 N. Henry Boulevard  
Stockbridge, Georgia 30281

1-58-151-02-7B-39571

Dear Mr. Turner:

During a recent compliance inspection at your firearms business covering the period of June 6, 2015 to June 6, 2016, 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 Violation, Form 5030.5, issued at the time of the inspection is enclosed.

You should be aware that any willful violations of the Gun Control Act may result in revocation of your Federal firearms license. As a result of the recently cited violations, it is important that we have a meeting with you to discuss the violations found. **The conference will be held on December 22, 2016, at 10:00 AM at 2600 Century Parkway, NE, Atlanta, GA 30345.** The agenda for the meeting will include a discussion of the reasons for the violations, a review of the legal requirements, and a discussion of steps to be taken by you to ensure future compliance. Although we do not believe it necessary, legal counsel may assist you at your own expense if you so choose. Please bring a compliance plan with your documentation verifying the corrective actions you have taken or will implement to ensure future compliance.

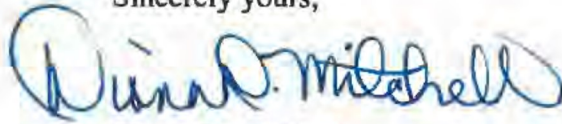
The records you are required to maintain and the business operations you conduct are important to law enforcement in our continuing efforts to reduce violent crime and protect the public. It is essential that you comply with all Federal laws and regulations that govern your firearms business to aid in this effort to combat violent crime.

Mr. Grady Edward Turner, CEO  
Ed's Pawn Shop, Inc.  
Ed's Public Safety

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) to confirm this appointment, and to ask questions you may have regarding this conference. I look forward to meeting with you to resolve these issues.

Sincerely yours,



Diana D. Mitchell  
Director Industry Operations, Atlanta Field Division

Enclosure

cc: Atlanta Group V (IO)  
Federal Firearms Licensing Center





U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Atlanta, Georgia 30345

DEC 22 2016

www.atf.gov

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5373

Mr. Grady Edward Turner, CEO  
Ed's Pawn Shop, Inc.  
Ed's Public Safety  
4431 N. Henry Boulevard  
Stockbridge, Georgia 30281

1-58-151-02-7B-39571

Dear Mr. Turner:

This letter is a follow-up to the warning conference held with you on December 22, 2016 at the Atlanta Field Division Office located at 2600 Century Parkway, Atlanta, GA 30345. During this conference, the violations cited during the inspection covering the period June 6, 2015 through June 6, 2016, and the necessary corrective action to prevent the violations from recurring were discussed.

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

**Regarding Violations # 1, 2, 3 & 4** where you failed to obtain complete and accurate information on the ATF Forms 4473 in accordance with the instructions on the form, where certain items on the forms were blank or incorrect. You stated that you have implemented a fourth review of the ATF Forms 4473, and will ensure the employees thoroughly conduct all reviews of the forms, in particular the second review, which occurs before the purchaser leaves the store.

**Regarding Violation # 5** where you failed to conduct a background check and accepted an expired Georgia permit, which is a non-qualifying State permit, as substitute for NICS check in one instance. You stated that the employee responsible for the sale missed noticing that the permit was expired. You stated that you will ensure the policy is followed to not accept non-qualifying State permits as a substitute for NICS checks.

**Regarding Violation # 6** where you failed to prepare and file multiple sales reports when legally required in [REDACTED] instances. You stated that your computer software is designed to flag and/or notify the employee of the need to complete a multiple sale report for a particular transaction.



Mr. Grady Edward Turner  
Ed's Pawn Shop, Inc. d/b/a Ed's Public Safety

You also stated that you've spoken with the software producer concerning the notifications, and can run a report of all multiple sales from your computer software system. In going forward, employees will be cognizant of the notifications and complete the multiple sale report as required.

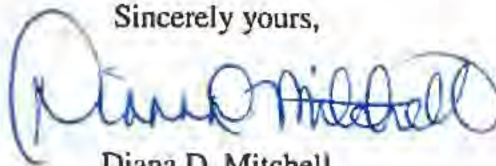
**Regarding Violation # 7** where you failed to prevent the transfer of a handgun or receiver to an out-of-State resident in (b)(6) instances, involving military customers. You stated that you have a large military customer base and try to accommodate all of their requests, upon receipt of the required permanent change of station orders (PCS). You stated that your team of workers have found a few errors with the PCS and are trying to remain aware of the different original documents issued by each military branch that indicates a person has been assigned permanently to the State of Georgia, and the sale is permissible.

**Regarding Violation # 8** where you failed to prevent the transfer of a firearm to a prohibited person knowing or having reason to believe that the transferee is a prohibited person, after receiving a denied response by the NICS system in (b)(6) instances. You stated that your employee failed to follow the procedure of notating on the front of the form, in red ink, the word "DENIED," and, as a result, the firearms were transferred. You will ensure that your employees follow the procedures to stamp the forms denied, review the forms thoroughly before the transfer, and audibly and verbally articulate to themselves the type of transaction they are handling when recording on the form, such as proceed, or denied. This manner of operation will assist with preventing prohibited transfers of firearms.

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

Please contact us at (b)(6) if you have any questions concerning your responsibilities as a licensee or if you require further clarification about particular requirements of the Federal Firearms Laws.

Sincerely yours,



Diana D. Mitchell  
Director, Industry Operations

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