

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Ed's Pawn Shop, Inc. Ed's Public Safety 4431 N. Henry Boulevard Stockbridge, GA 30281, Henry		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 760530-2014-0065-B1B		
		3. PERMIT/LICENSE NUMBER 158151024B39571	4a. TARGET DATE	4b. TARGET HOURS
		5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		
6. ATF OFFICER(S) ASSIGNED (b)(6) - Assigned Investigator (b)(6) - Assigned Investigator (b)(6) - Lead Investigator (b)(6) - Assigned Investigator (b)(6) - Assigned Investigator (b)(6) - Assigned Investigator (b)(6) - Assigned Investigator				
7. ASSIGNED BY (SIGNATURE, TITLE AND DATE) (b)(6) Area Supervisor, 10/01/2013				
8. PURPOSE/SPECIAL INSTRUCTIONS Conduct Recall Firearms Compliance Inspection. Last inspection resulted in adverse action or a recommended recall. Obtain printout from NTC. Identify and refer potential traffickers.				
9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)
NO. OF VIOLATIONS	7	NO. OF REFERRALS	4	2111 - PER DIEM
NO. OF TECS CHECKS	40	NO. OF TECS HITS		2112 - P.O.A.
NO. OF TAX ADJUSTMENTS		\$ VALUE OF TAX INCREASES		2113 - COMM. AIR
		\$ VALUE OF TAX DECREASES		2114 - RENTAL CAR
NO. OF ASSESSMENTS		\$ VALUE OF ASSESSMENTS		2115 - GPV EXPENSES
NO. OF CLAIMS		\$ VALUE OF CLAIMS		2116 - MISC.
NO. OF TAX PERIODS		\$ VALUE OF TAXES VERIFIED		TOTAL \$ FOR INSP.
11. ATF OFFICER'S RECOMMENDATION Submitted by (b)(6) - Industry Operations Investigator Submitted on: 02/19/2015 Viols DIO (or Delegate) Held WC ILO Revocation				
12. TIME ACCOUNTING DATA				
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)				
JAN 0		78.50		
ATF OFFICER'S SUBTOTAL		78.50	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)				
JAN 0		42.50		
ATF OFFICER'S SUBTOTAL		42.50	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)				
JAN 0		87.00		
FEB 0		53.50		
MAR 0		4.00		
JUN 0		3.00		
JUL 0		.50		

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12. TIME ACCOUNTING DATA

ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)
DEC 0	4.00
ATF OFFICER'S SUBTOTAL	152.00
ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)
JAN 0	64.45
ATF OFFICER'S SUBTOTAL	64.45
ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)
JAN 0	51.00
ATF OFFICER'S SUBTOTAL	51.00
ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)
JAN 0	93.75
FEB 0	25.50
MAR 0	3.00
JUL 0	1.50
AUG 0	2.00
ATF OFFICER'S SUBTOTAL	125.75
ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)
JAN 0	46.00
ATF OFFICER'S SUBTOTAL	46.00
ATF OFFICER'S SIGNATURE	
TOTAL HOURS	560.20

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Violations DIO Held WC ILO Revocation is the recommendation.

Under current policy, revocation of the Federal Firearms License would be justified for a licensee who has previously been the subject of a warning conference (WC) within the last five years and the current inspection warrants another WC for a repeated similar violation. During this inspection, it was disclosed that Ed's Pawn Shop, Inc., failed to file multiple sales reports when legally required to in (b)(6) or more instances (b)(6) instances). This is a repeat violation which would require another WC. Although, the licensee had other repeat violations during the current inspection, the violations would only rise to the level of a Warning Letter (W/L).

The licensee is initiating a new Standard Operating Plan as a result of this inspection that will have more checks/balances to ensure compliance.

Viols DIO (or Delegate) Held WC ILO Revocation

☒ REVIEWED

☒ CONCUR

☐ SEE COMMENTS

☐ FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6) - Area Supervisor	REVIEW DATE 05/26/2015
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Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Ed's Pawn Shop, Inc. Ed's Public Safety 4431 N. Henry Boulevard Stockbridge, GA 30281, Henry	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 760530-2014-0065-B1B		
	3. PERMIT/LICENSE NUMBER 158151024B39571	4a. TARGET DATE	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

The compliance investigation disclosed a total of seven (7) violations for which only one violation, 27 CFR 478.126a, warrants and administrative action, specifically involving a warning conference (WC). However, under current policy, revocation of the Federal Firearms License (FFL) would be justified for a licensee who has previously been the subject of a WC within the last five years (2011) and the current inspection warrants another WC for a repeated similar violation. During the inspection, it was discovered that Ed's Pawn Shop, Inc., failed to file multiple sales reports when legally required to in ^{(b)(3)} or more instances, in this case, ^{(b)(3)} instances. A recommendation of DIO Held WC ILO Revocation is being recommended due to the following: There was a total of five repeat violations; however, the violation of 27 CFR 478.126a is the only violation that warrants an administrative action. The FFL is a high volume dealer who had a 73% increase in the number of multiple sales that occurred from the last investigation, and the number of instances the FFL failed to report the sales only increased by ^{(b)(3)} (failed to report ^{(b)(3)} in 2011). Lastly, through an added feature to the business computer system, the FFL has already instituted a new Standard Operating Plan to ensure tighter checks & balance, and future compliance.

Viols DIO (or Delegate) Held WC ILO Revocation

☒ REVIEWED

☒ CONCUR

☒ SEE COMMENTS

☒ FINAL DISPOSITION

SIGNATURE AND TITLE

DDMITCHEL2 - Director, Industry Operations

REVIEW DATE

06/04/2015

ROUTING SEQUENCE AND DATE

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

CONTROL FILE POSTED DATE _____

Report of Violations

Instructions

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

Name of Proprietor 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) 158151024B39571	Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015				

Inspection Results

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

Number: 1

Nature of Violation:

Failure to record the disposition of (b)(3) 112 PL-5 firearms in the Acquisition and Disposition record (A&D).

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

Citation: 27 CFR 478.125(e)

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

Corrective Action to be Taken: (If not corrected immediately) The licensee shall accurately and timely record the disposition of all firearms within seven (7) days from the date of the transfer. All dispositions were accounted for and recorded in the A&D record. No firearms were reported "missing" to ATF.

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) 158151024B39571	Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015				

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:

Failure to have the transferee accurately complete Section A of the ATF Form 4473, prior to the transfer of a firearm on twenty-nine (29) ATF Forms 4473.

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

Corrective Action to be Taken: The licensee will have the transferee complete Section A of the ATF Form 4473 fully and accurately prior to the transfer of the firearm. The licensee will thoroughly review the ATF Form 4473 to ensure it is properly completed prior to the transfer of the firearm.

- In (b)(3) 112 PL 55 instance, Section A, item 2 was incorrect. (b)(3) 112 PL 55 125 STAT 552
- In (b)(3) 112 PL 55 instance, Section A, item 3 was incorrect. (b)(3) 112 PL 55 125 STAT 552
- In (b)(3) 112 PL 55 instance, Section A, item 4 was blank. (b)(3) 112 PL 55 125 STAT 552
- In (b)(3) 112 PL 55 instance, Section A, item 5 was blank. (b)(3) 112 PL 55 125 STAT 552
- In (b)(3) 112 PL 55 instance, Section A, item 11d was blank. (b)(3) 112 PL 55 125 STAT 552
- In (b)(3) 112 PL 55 instance, Section A, item 11g was blank. (b)(3) 112 PL 55 125 STAT 552
- In (b)(3) 112 PL 55 instances, Section A, item 11h was blank. (b)(3) 112 PL 55 125 STAT 552
- In (b)(3) 112 PL 55 instance, Section A, item 11k was blank. (b)(3) 112 PL 55 125 STAT 552
- In (b)(3) 112 PL 55 instances, Section A, item 11l was blank. (b)(3) 112 PL 55 125 STAT 552
- In (b)(3) 112 PL 55 instance, Section A, item 16 was blank. (b)(3) 112 PL 55 125 STAT 552
- In (b)(3) 112 PL 55 instance, Section A, item 16 was incorrect. (b)(3) 112 PL 55 125 STAT 552
- In (b)(3) 112 PL 55 instances, Section A, item 17 was blank. (b)(3) 112 PL 55 125 STAT 552
- In (b)(3) 112 PL 55 instances, Section A, item 17 was incorrect. (b)(3) 112 PL 55 125 STAT 552

Report of Violations

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License/Permit/Registry Number (If any) 158151024B39571	Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015				

Inspection Results

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

In (b)(3) instance, Section A, items 1-15 were completed by FFL employee (b)(3) 112 PL 55 125 STAT 552
Citation: 27 CFR 478.124(c)(1)

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 4 of 9 Pages
License/Permit/Registry Number (If any) 158151024B39571	Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015				

Inspection Results

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

Number: 3

Nature of Violation:

Failure to record on the ATF Form 4473 the identification document used to establish the place or residence of the transferee in (b)(3) 112 PL 55 125 STAT instances.

In the case of transferees who were members of the Armed Forces on active duty and permanently stationed in Georgia and had a driver's license from another state, the licensee obtained and recorded on the ATF Form 4473 the transferee's out-of-State driver's license, the transferee's military orders showing their permanent duty station in Georgia but failed to (b)(3) 112 PL 55 125 STAT instances to record the transferee's military identification card on the ATF Form 4473 (b)(3) 112 PL 55 125

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

In (b)(3) 112 PL 55 instance, a transferee presented an out- of-State driver's license and a Georgia Firearms License (GFL) with the current address. However, the GFL information was not recorded on the ATF Form 4473 as alternate documentation. (b)(3) 112 PL 55 125 STAT 552

Failure to record the correct information from the government identification document (expiration date) in (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 was advised that before a licensee may sell or deliver a firearm to a nonlicensee, the licensee must establish the identity, place of residence, and age of the buyer with a government issued photo identification and record on the ATF Form 4473 the type of I.D., number and expiration date in Item 20a.

The licensee was advised that 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 will list the the buyer's military identification card and official orders showing where his or her permanent duty station is located in response to question 20a.

The licensee was advised to record the correct issuing authority and type of identification, identification number, and expiration date in item 20a.

The licensee was advised that in the case of an individual who's identification document does not show the current

Report of Violations

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License/Permit/Registry Number (If any) 158151024B39571	Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015				

Inspection Results

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

residence address, an alternate government issued document with the transferee's current residence address must be provided and recorded in item 20b.

Correct the ATF Form 4473 by making a copy of the ATF Form 4473, having the correction made on the copy, dating and initialing the corrections. The copy will then be stapled to the original ATF Form 4473.

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

Report of Violations

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License/Permit/Registry Number (If any) 158151024B39571	Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015				

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:

Failure 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) 112 PL 55 125 STAT 552 ATF Forms 4473.

In (b)(3) 112 PL 55 125 instance, Section B, item 21a was left blank (b)(3) 112 PL 55 125
In (b)(3) 112 PL 55 125 instances, Section B, item 21a was incorrect (b)(3) 112 PL 55 125 STAT 552
(b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instances, Section B, item 21c was left blank (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instances, Section B, item 21d was left blank (b)(3) 112 PL 55 125 STAT 552

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

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

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

The licensee was advised to comply with the requirements of 27 CFR 478.102 and record on the ATF Form 4473 the correct 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".

The licensee was advised on how to correct the ATF Form 4473 by making a copy of the ATF Form 4473, having the correction made on the copy, dating and initialing the corrections. The copy will then be stapled to the original ATF Form 4473.

Report of Violations

Instructions

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License/Permit/Registry Number (If any) 158151024B39571	Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015				

Inspection Results

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

Number: 5

Nature of Violation:

Failure to record the date or record the correct date on (b)(3) 112 PL 55 125 STAT 552 ATF Forms 4473.

In (b)(3) 112 PL 55 125 STAT 552 instances, Section D, item 36, the date transferred was left blank (b)(3) 112 PL 55 125 STAT 552

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

In (b)(3) 112 PL 55 125 STAT 552 instances, Section D, item 36, the date transferred was incorrect (b)(3) 112 PL 55 125 STAT 552

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

Citation: 27 CFR 478.124(c)(5)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee was instructed to sign and date the ATF Form 4473 if they do not know or have reasonable cause to believe that the transferee is disqualified by law from receiving the firearm.

The licensee was advised how to correct the ATF Form 4473 by making a copy of the ATF Form 4473, having the correction made on the copy, dating and initialing the corrections. The copy will then be stapled to the original ATF Form 4473.

Report of Violations

Instructions

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

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License/Permit/Registry Number (If any) 158151024B39571	Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015				

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:

Failure 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) 112 PL 55 125 S instances. The licensee transferred two or more handguns to the same individual within a live business day period and failed to submit the ATF Form 3310.4 in (b)(3) 112 PL 55 125 S instances

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

Citation: 27 CFR 478.126a

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

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

Licensee was instructed to immediately prepare and submit an ATF F's 3310.4 for the unreported multiple sales. Licensee was advised that each licensee shall prepare a report of multiple sales, ATF F 3310.4, whenever the licensee sells or otherwise disposes of, at any one time or during 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. Licensee was further advised that the report shall be prepared on Form 3310.4, Report of multiple sales or other Disposition of Pistols or Revolvers.

(b) (6)

2-17-15

Report of Violations

Instructions

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License/Permit/Registry Number (If any) 158151024B39571	Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015				

Inspection Results

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

Number: 7

Nature of Violation:

Failure to 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) 112 PL 55 125 STA ATF Forms 4473.

- In (b)(3) 112 PL instance, Section B, item 18 was left blank. (b)(3) 112 PL 55 125 STA
- In (b)(3) 112 PL instance, Section B, item 18 was incorrect. (b)(3) 112 PL 55 125 STA
- In (b)(3) 112 PL 55 125 instances, Section B, item 24 was left blank (b)(3) 112 PL 55 125 STAT 552
- (b)(3) 112 PL 55 125 STAT 552
- In (b)(3) 112 PL 55 instances, Section B, item 25 was left blank (b)(3) 112 PL 55 125 STAT 552
- (b)(3) 112 PL 55 125 STAT 552
- In (b)(3) 112 PL instances, Section D, item 30a was left blank. (b)(3) 112 PL 55 125 STAT 552
- (b)(3) 112 PL 55 125
- In (b)(3) 112 PL instance, Section D, item 30a was incorrect. (b)(3) 112 PL 55 125 STA
- In (b)(3) 112 PL instances, Section D, item 30b was blank. (b)(3) 112 PL 55 125 STAT 552
- (b)(3) 112 PL 55 125

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

Corrective Action to be Taken: The licensee was instructed to have all required information on ATF Forms 4473 completed in accordance with instructions /and headings on the form.

The licensee was advised to correct items in Sections B and D of ATF Form 4473 by making a copy of the ATF Form 4473, having the correction made on the copy, dating and initialing the corrections. The copy will then be stapled to the original ATF Form 4473.

Citation: 27 CFR 478.21(a)

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

Date
2.17.15

Signature (b)(6)
F101

Date
2/17/2015

For Official

FIREARMS INSPECTION REPORT

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

UI#: 760530-2014-0065-B1B
FFL#: 1-58-151-02-4B-39571

Address: 4431 N. Henry Boulevard
Stockbridge, Georgia 30281

1 - Introduction

Inspection Profile:

On January 12, 2015, Industry Operations Investigator (IOI) (b)(6) led a Recall Firearms Compliance Inspection on Federal Firearms Licensee (FFL), Ed's Pawn Shop, D/b/a Ed's Public Safety. The inspection was conducted in accordance with Firearms Compliance Inspection Guidelines, and the instructions provided on the ATF Form 5700.14, Assignment and Report.

The Area Supervisor, in accordance with current office procedures, provided advanced notification to the ATF Atlanta Field Division, Criminal Enforcement (CE) Supervisors.

A query of the Federal Licensing System (FLS) disclosed that Ed's Pawn Shop has a Special Attention Flag (SAF) for being under a "Demand Letter 2". (*A "Demand Letter 2" is sent to FFLs who have had fifteen or more firearms traced to them the previous year with a "time-to-crime" of three years or less. The affected FFLs are required to submit limited information regarding "used" firearms that they acquired the previous year. The FFL is required to submit this information quarterly, and until informed otherwise.*)

A Query of NForce was negative for any possible open ATF criminal investigations.

The following ATF personnel participated in the inspection: (b)(6) (A/S), (b)(6) (IA), (b)(6) (IOI), (b)(6) (IOI), (b)(6) (IOI), (b)(6) (IOI), (b)(6) (IOI), and (b)(6) (IOIS).

The following personnel for Ed's Pawn Shop, Inc. were present and interviewed during the inspection Mr. Grady "Ed" Turner, CEO, (GA D/L (b)(6) Exp. 10/12/2016), Lisa Patrick, Controller (GA D/L (b)(6) Exp. 4/23/2017), (b)(6), General Manager, and (b)(6), Pawn Manager.

The inspection was initiated on January 12, 2015. The inspection took place at

FIREARMS INSPECTION REPORT

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

UI#: 760530-2014-0065-B1B
FFL#: 1-58-151-02-4B-39571

the business premises located at 4431 N. Henry Boulevard, Stockbridge, Georgia 30281. No advance notification was given to the licensee prior to the initiation of the inspection. The period of review was from January 12, 2014 to January 12, 2015. This is the sixth inspection conducted on the licensee since issuance of the license. The closing conference was held on February 17, 2015.

Business Profile:

Ed's Pawn Shop, Inc. is licensed as a type 02 licensee, which is a dealer, including pawnbroker, in firearms other than destructive devices. The license was originally issued on January 27, 1996. The license was found to be suitable for the type of business conducted. Ed's Pawn Shop, Inc. holds no other ATF licenses. However, Ed's Pawn Shop, Inc. has a current 2015, type 63, Class III Special Tax Stamp as a NFA firearms dealer under control number (b)(3) 26 USC 6103.

The licensee is located in a retail/urban area within the City limits of Stockbridge, Georgia. Ed's Pawn Shop, Inc. has a City of Stockbridge Occupational Tax Certificate #0002 for the period January 1, 2015 to December 31, 2015.

During the inspection period, the licensee acquired approximately (b)(4) firearms consisting of approximately (b)(4) handguns, (b)(4) long guns, and (b)(4) receivers. Of the firearms acquired by the licensee (b)(4) were new firearms and (b)(4) were used. The licensee's primary suppliers of new firearms are (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. Ed's Pawn Shop, Inc. sells new and used firearms. For the period of inspection, the licensee disposed of approximately (b)(4) firearms consisting of (b)(4) handguns, (b)(4) long guns, and (b)(4) receivers. Of the firearms disposed, approximately (b)(4) were new firearms and (b)(4) were used. Approximately, (b)(4) of the firearms business involves wholesale transfers to licensees, (b)(4) percent are retail transfers and (b)(4) percent are pawn redemptions. Ed's Pawn Shop, Inc. is a Glock distributor and is currently ranked as the third highest selling Glock dealer in the country and is the number one Glock distributor in Georgia. According to Mr. Turner, Ed's Pawn

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Shop, Inc. has consistently ranked in the top ten for Glock distributors in the country.

Ed's Pawn Shop is also a dealer in NFA weapons. During the period of inspection, the licensee acquired (b)(4) NFA firearms and disposed of (b)(4) NFA firearms. The majority of these transfers were to law enforcement agencies.

Ed's Pawn Shop, Inc. buys used service weapons from law enforcement agencies and provides these agencies credit to buy new service firearms to include NFA firearms. Ed's Pawn Shop, Inc. 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, Ed's Pawn Shop Inc. destroys any unserviceable weapons (unsafe or altered serial numbers) received from law enforcement agencies through the seizure and condemnation process.

Ed's Pawn Shop, Inc. conducts internet sales and has two websites, www.edspawn.com, and 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 for firearm sales. Ed's Pawn Shop, Inc. makes internet transfers for their customer's.

The licensee does not conduct business at gunshows. The licensee does not conduct any manufacturing, importing or gunsmith activity. Ed Pawn Shop, Inc. does not sell black powder.

No other business is conducted on the premises.

Ed's Pawn Shop, Inc. has one offsite storage location. (b)(4)

[REDACTED] . Turner advised the inspection team of this offsite storage at the initiation of the inspection and immediately made the firearms available for inspection.

Ownership and Control:

Ed's Pawn Shop, Inc. d/b/a Ed's Public Safety operates as a Domestic For-Profit

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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 (2014) shows Mr. Turner 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 Mr. Turner and Ms. Patrick as the only 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.

2 - Recommendation

Viols DIO Held WC ILO Revocation

3 - Inspection History

Date and Type of Inspection: February 7, 2011, Firearms DE Inspection
UI#: 771030-2011-0022-B1B
Inspection Results: Violations, WC with WL and Recall
Cited Violations: 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) 112 PL 55 125 ATF Form 4473 transactions.

27 CFR 478.99(c) - Licensee transferred a firearm to a person knowing or having reasonable cause to believe that such person was prohibited on the following ATF Form 4473 transaction:

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

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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 [REDACTED] ATF Form 4473 the type of identification used.

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 [REDACTED] ATF Form 4473 transaction.

27 CFR 478.21a - 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 [REDACTED] ATF Form 4473 transactions.

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 [REDACTED] ATF Form 4473 transactions.

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

Date and Type of Inspection: January 12, 2009, Recall Compliance Inspection
UI#: 771030-2009-0090-B1B
Inspection Results: Violations, ROV Only and Recall
Cited Violations: 27 CFR 478.124(c)(1) - The licensee failed to obtain ATF F4473's containing all the information in Section A & Section C as indicated by the headings and instructions on the form on [REDACTED] 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 Form 4473 in (b)(3) instances. In (b)(3) of the (b)(3) instances, (b)(3) 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) instances; and (b)(3) Form 4473 had an incorrect date of purchaser's certification. The information required by the headings and instructions on ATF Form 3373 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 transfer did not take place.

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

Date and Type of Inspection: November 7, 2007, Firearms Compliance Inspection
UI#: 771030-2008-0179-B1B
Inspection Results: Warning Conference in Lieu of Revocation
Cited Violations: 27 CFR 478.99(c) - The Licensee Transferred (b)(3) - 112 Public Law 55 125 Stat 552 (b)(6)

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

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Ed's Pawn Shop, Inc. uses computerized acquisition and disposition (A&D) records A&D. 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 accordance with the criteria provided in ATF Ruling 2013-5. *(The A&D record was downloaded to a flash drive provided to the FFL by IOI (b)(6). Each open A&D entry was compared to the physical inventory. At the end of each day of inspection the flash drive was returned to a store manager to remain in their possession until the next day when it was retrieved by IOI (b)(6). At no time did the A&D record leave the business premises. At the end of the inspection the flash drive was erased by the licensee and was returned to IOI (b)(6).)*

A full physical inventory of all firearms was conducted by the ATF inspection team. Ed's Pawn Shop, Inc. had a total of 3,117 firearms in physical inventory. There were (b)(3) 112 FL open disposition entries in the A&D book. It was disclosed that there were (b)(3) 112 open dispositions in the A&D record for which there was no firearm in inventory. **(Ref. Worksheet 1).** These unrecorded dispositions were immediately reconciled by the licensee and recorded in the A&D record. No firearms were reported as "Missing". The licensee was cited for a violation of 27 CFR 478.125(e), failure to record the disposition of (b)(3) 109C firearms in the Acquisition and Disposition record (A&D). **(Ref. ROV # 1, Worksheet 1, Exhibits 1-5).**

Fifty dispositions were traced to the ATF Form 4473, no discrepancies were disclosed.

The licensee did not report any firearm thefts or losses during the period of inspection.

No trafficking issues relating to acquisition and disposition of firearms were disclosed.

No unregistered NFA firearms or firearms with obliterated serial numbers were found in inventory.

The standard operating procedures were evaluated through interviews, observation and examination of the records. There are five to ten employees handling the day to day operations, such as making all acquisition and disposition entries in the computerized A&D record and conducting firearms transactions. All firearms acquired are entered into the A&D computerized records by the end of the day that they are received. The computer system will automatically generate inventory tags with special identifiers (G= Used and GI= New) for all acquired firearms. The tag will also have a UPC bar code to track the firearm. The *Pawn Master* program automatically updates the firearm

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dispositions into the computerized A&D record as the transaction is being conducted. The physical serial number of each firearm transferred is compared against the A&D entry, the inventory tag, the ATF Form 4473 and the sales receipt before the firearm is handed to the purchaser.

Quarterly firearms inventories are conducted. The inventories are conducted on a Sunday when the store is closed and firearm transactions are not occurring. The inventory is conducted by scanning the bar code on each firearms identification tag. The Pawn Master program will then compare the data scanned with the information recorded in the A&D record and then generate a discrepancy report. All discrepancies are then immediately reconciled.

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. The business security includes cameras, additional barred gate in front of main door, and an alarm system monitored by Stockbridge Police Department.

5 - ATF Forms 4473 – NICS & Other Dispositions

Ed's Pawn Shop, Inc. had (b)(3) - 112 PL ATF Forms 4473 on file for the inspection period. The licensee was found to be filing their ATF Forms 4473 sequentially and chronologically. The ATF Form 4473 transaction serial numbers are sequential for that year and then start over when a new year begins. All ATF Forms 4473 for the inspection period were reviewed. Errors/discrepancies were disclosed on (b)(3) - 112 forms. Copies were obtained of the respective ATF Forms 4473 as documentation of the violations. *(Copies were obtained by taking photographs of the respective ATF Forms using ATF issued I-phones. The forms were not removed from the premises.)*

The review of the ATF Forms 4473 on file disclosed the following violations:

Failure to have the transferee accurately complete Section A of the ATF Form 4473, prior to the transfer of a firearm on (b)(3) 112 PL 55 125 STAT 552 ATF Forms 4473.

In (b)(3) 112 PL 55 125 instance, Section A, item 2 was incorrect. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instance, Section A, item 3 was incorrect. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instance, Section A, item 4 was blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instance, Section A, item 5 was blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instance, Section A, item 11d was blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instance, Section A, item 11g was blank. (b)(3) 112 PL 55 125 STAT 552

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In (b)(3) 112 PL 55 125 STAT 552 instances, Section A, item 11h was blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section A, item 11k was blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instances, Section A, item 11l was blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section A, item 16 was blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section A, item 16 was incorrect. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instances, Section A, item 17 was blank. (b)(3) 112 PL 55 125 STAT 552
(b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instances, Section A, item 17 was incorrect. (b)(3) 112 PL 55 125 STAT 552
(b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section A, items 1-15 were completed by FFL employee. (b)(3) 112 PL 55 125 STAT 552

The licensee was cited for a violation of 27 CFR 478.124(c)(1). This was a repeat violation cited during the inspections occurring on January 12, 2009 and February 7, 2011.

(Ref. ROV #2, Worksheet 2-4473[2012 Edition], Exhibits 6-34)

It was disclosed that the licensee failed to record on the ATF Form 4473 the identification document used to establish the place or residence of the transferee in (b)(3) 112 PL 55 125 STAT 552 instances. In the case of transferees who were members of the Armed Forces on active duty and permanently stationed in Georgia and had a driver's license from another state, the licensee obtained and recorded on the ATF Form 4473 the transferee's out-of-State driver's license, the transferee's military orders showing their permanent duty station in Georgia, but failed in (b)(3) 112 PL 55 125 STAT 552 instances to record the transferee's military identification card on the ATF Form 4473. (b)(3) 112 PL 55 125 STAT 552

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

In (b)(3) 112 PL 55 125 STAT 552 instance, a transferee presented an out-of-State driver's license and a Georgia Firearms License (GFL) with the current address. However, the GFL information was not recorded on the ATF Form 4473 as alternate documentation (b)(3) 112 PL 55 125 STAT 552.

The licensee also failed to record the correct information from the government identification document (expiration date) in (b)(3) 112 PL 55 125 STAT 552 instance (b)(3) 112 PL 55 125 STAT 552

The licensee was cited for a violation of 27 CFR 478.124(c)(3)(i). This was a repeat

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violation cited during the inspections occurring on January 12, 2009 and February 7, 2011.

(Ref. ROV #3, Worksheet 2-4473[2012 Edition], Exhibits 37-56)

During the ATF Form 4473 review, it was disclosed that the 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) 112 PL 55 125 STAT 552 ATF Forms 4473.

In (b)(3) 112 PL 55 125 STAT 552 instance, Section B, item 21a was left blank. 14-3000

In (b)(3) 112 PL 55 125 STAT 552 instances, Section B, item 21a was incorrect (b)(3) 112 PL 55 125 STAT 552

In (b)(3) 112 PL 55 125 STAT 552 instances, Section B, item 21c was left blank. (b)(3) 112 PL 55 125 STAT 552

In (b)(3) 112 PL 55 125 STAT 552 instances, Section B, item 21d was left blank. (b)(3) 112 PL 55 125 STAT 552

The licensee was cited for a violation of 27 CFR 478.124(c)(3)(iv). This was a repeat violation cited during the inspection occurring on February 7, 2011.

(Ref. ROV #4, Worksheet 2-4473[2012 Edition], Exhibits 57-76)

The ATF Form 4473 review also disclosed that the licensee failed to record the date or record the correct date on (b)(3) 112 PL 55 125 STAT 552 ATF Forms 4473.

In (b)(3) 112 PL 55 125 STAT 552 instances, Section D, item 36, the date transferred was left blank. (b)(3) 112 PL 55 125 STAT 552

In (b)(3) 112 PL 55 125 STAT 552 instances, Section D, item 36, the date transferred was incorrect. (b)(3) 112 PL 55 125 STAT 552

The licensee was cited for a violation of 27 CFR 478.124(c)(5).

(Ref. ROV #5, Worksheet 2-4473[2012 Edition], Exhibit (b)(3) 112 PL 55 125 STAT 552)

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It was also found that the 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) 112 PL 55 125 STAT 552 ATF Forms 4473.

In (b)(3) 112 PL 55 125 STAT 552 instance, Section B, item 18 was left blank (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section B, item 18 was incorrect (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instances, Section B, item 24 was left blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instances, Section B, item 25 was left blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instances, Section D, item 30a was left blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section D, item 30a was incorrect. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instances, Section D, item 30b was blank. (b)(3) 112 PL 55 125 STAT 552

The licensee was cited for a violation of 27 CFR 478.21a. This was a repeat violation cited during the inspections occurring on January 12, 2009 and February 7, 2011.

(Ref. ROV # 7, Worksheet 2-4473[2012 Edition], Exhibits (b)(3) 112 PL 55 125 STAT 552)

Fifty ATF Forms 4473 were traced to the A&D records. No discrepancies were disclosed.

According to the audit log the licensee had 446 NICS "Non-Denied" transactions for the period October 31, 2014 to December 30, 2014. All but twelve of the NICS transaction numbers (NTN) could be traced to an ATF Forms 4473. The licensee also enters the NTN into their computerized A&D records. A query of their A&D records did not disclose the twelve NTN's. It was noted that all of the twelve NTN's were issued around high volume times such as Christmas and Thanksgiving (Black Friday). (b)(6), Pawn Manager, stated that during these times they were calling their NICS checks into the NICS center. Recently, Ed's Pawn Shop, Inc. started doing their NICS queries online. (b)(6) stated that many times NICS would transfer the call for further research, and they would end up being on hold for a very long period of time. (b)(6) stated that on many occasions the call would be dropped and they would have to call back and attempt to contact customer service but would be routed to

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a recorded message. (b)(3) 112 PL 55 125 STAT further stated that they would end up calling back and starting the process over and end up getting a new NTN number which would be recorded on the ATF Form 4473. Industry Operations Investigator (b)(6) contacted (b)(6), ATF NICS Liaison in regard to the matter. (b)(6) stated that he had discussed the situation with FBI NICS representatives and they stated that this was very possible during their high volume times. They stated that the licensee should have advised customer service that they had an NTN issued but their call had been dropped while waiting for further research. (b)(6) stated that in these instances the FFL should have recorded both numbers on the ATF Form 4473. After discussing the situation with Acting Supervisor (b)(6) and ATF Counsel, (b)(6), it was determined that the licensee would not be cited as there was no evidence of a violation. The licensee was thoroughly educated to use the NTN number issued and not conduct more than one NICS query on the same individual or this would be considered an abuse of the NICS system. They were advised to always contact customer service if a problem arose after an NTN was issued. The licensee is currently using NICS Online and these issues should not happen again.

Ed's Pawn Shop, Inc. had 528 NICS "Denied" transactions for the period November 30, 1998 to December 30, 2014. Thirty-five of the "Denied" transactions occurred during the inspection period. No discrepancies were disclosed during the review. The "Denied" transactions were found to be retained for the past five years and filed separately in chronological order.

Ed's Pawn Shop, Inc. makes a large number of firearm transfers to other licensee's. These transfers were found to have been conducted properly. The licensee attaches a copy of the invoice to a blank ATF Form 4473 that is serialized. This allows for the documentation for the transaction to be easily found and accessed when referenced from the A&D records.

The licensee was also found to have made numerous sales to individual law enforcement officers for official duty purposes as well as to large police departments during the period of inspection. These law enforcement transfers were found to be accurately conducted and documented.

One trafficking issue related to firearm purchasers was disclosed involving a possible straw purchaser. A Referral of Information, #2015-0013, was generated and forwarded to ATF Atlanta VI (Intel) for intelligence purposes (See Referral Section).

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The standard operating procedures were evaluated through interviews, observation and examination of the records. Once a buyer is ready to purchase a firearm, the store clerk asks the purchaser for their Georgia firearms carry permit first and then their Georgia driver's license. The transferee's identification is examined and if the transferee's identification is valid, then the buyer will complete an ATF Form 4473 prior to any other activity taking place. If the buyer does not have a valid Georgia firearms carry permit, a background check (NICS) is initiated upon completion of ATF Form 4473. If the NICS check results are favorable or if the transferee has a valid Georgia Firearms permit, Section B and D of the form are completed by store clerk handling the transaction. The clerk attaches copies of the identification documents and Georgia firearms carry permit (if applicable) to the ATF Form 4473. After the transaction is completed a second clerk will review the ATF Form 4473. At the end of each day, a store clerk will review all the forms completed during the day. Each person reviewing the ATF Forms 4473 will initial the form. If an error is disclosed prior to the transaction being completed the customer will strike through the answer and record the correct response. IOI (b)(6) reminded the licensee that the customer must not only initial the correction but date it.

For errors discovered after the transaction is completed, the FFL was advised of the correct procedure to make a copy of the original and to make corrections to the copy and attach the copy to the original. The licensee was advised by IOI (b)(6) that they could only make changes to items in section B and D of the ATF Form 4473. The FFL was made aware that the purchaser was not required to come back to the store to make corrections, and it was completely voluntary for them to return to the store. The licensee was also advised not to visit the purchaser's residence to have the ATF Form 4473 corrected. The licensee's computer program will "Flag" any multiple sale of a firearm (handgun or long gun) to the same customer within five 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 license will begin to create a report of all firearm sales for the last five days to double check that no multiple sales of handguns to the same purchaser were missed.

6 – Multiple Sales

The Violent Crime Analysis Branch (VCAB) FFL Master Query report was obtained for the three year period covering December 31, 2011 to December 31, 2014. The report revealed that the licensee had (b)(3) - 11 multiple sales involving (b)(3) - 112 P01 firearms. It was determined that (b)(3) - 11 multiple handgun purchases occurred in the last twelve months involving (b)(3) - 11 handguns. According to e-trace Ed's pawn shop has submitted a total of (b)(3) - 112 P01 multiple sales to ATF in total.

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During the review of ATF F's 4473, for the period January 12, 2014 to January 12, 2015, it was disclosed that the licensee failed to prepare and submit a report of multiple sale ATF Form 3310.4 for the sale of two or more handguns to the same individual within a five business day period in (b)(3) 112 PL 55 125 STAT 552 instances involving (b)(3) 112 PL 55 125 handguns. The licensee was cited for a violation of 27 CFR 478.126(a) (Ref. ROV #6, Worksheet 2-4473[2012 Edition], Exhibits 20, 41, 117-125). This was a repeat violation cited during the inspection occurring on February 7, 2011.

#	NAME	Date of Purchase	Manufacturer/Importer	Model	Serial Number	Type	Caliber/ Gauge
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(b)(3) 112 PL 55 125 STAT 552

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GLOCK 37 LAB 274 Pistol 45
(b)(3) 112 PL 55 125 STAT 552

It should be noted that **(b)(3) 112 PL 55 125 STAT 552** ATF Forms 3310.4 involving **(b)(3) 112** handguns were also found to be completed and attached to ATF Forms 4473 but were not recorded on the VCAB FFL Master Query report. This would bring Ed's Pawn Shop's total number of multiple sales for the last twelve months to **(b)(3)-11** multiples involving **(b)(3)-11** handguns. The licensee was faxing their multiple sale reports to ATF. It could not be determined if the ATF Forms 3310.4 were not reported on the VCAB report as a result of error on ATF's part or the FFL's. Therefore, the licensee was not cited per DAD

(b)(6) email dated September 18, 2014. Copies of these multiple sale forms were e-mailed to the National Tracing Center (NTC) (**Ref. Exhibit 126**). The licensee was educated on the process of submitting ATF Forms 3310.4 by email in order for a confirmation e-mail to be obtained from ATF NTC and attached to the ATF Form 4473. This would alleviate any problems with faxing the forms. The licensee will submit all future ATF Forms 3310.4 via e-mail. The licensee immediately completed and submitted ATF Forms 3310.4 for the **(b)(3) 112 PL 55** unrecorded multiple handgun transactions. All corrected ATF Forms 3310.4's were submitted via e-mail to the NTC.

7 – Suspicious/Prohibited Purchasers

The ATF Forms 4473 were reviewed by purchaser's names and addresses to determine if the purchasers were potential traffickers or straw purchasers or may be engaging in the business without an FFL. The ATF Forms 4473 were also reviewed for high crime firearms.

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

(b)(3) 112 PL 55 Referral of Information, **(b)(3) 112 PL 55 125 STAT 552**, was generated and forwarded to ATF Atlanta VI (Intel) for intelligence purposes (See Referral Section).

(b)(3) 112 PL 55 individuals who may be engaging in the business of dealing in firearms without a license were disclosed.

It was determined that **(b)(6) (b)(3) 112 PL 55 125 STAT 552**

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

Referral # 2015-0014 was made to the Atlanta Field Division Intelligence Group for information purposes (See Referral Section).

It was also disclosed that (b)(3) - 112 Public Law 55 125 Stat 552 (b)(6)

Referral # (b)(3) 112 PL 55 125 STAT 552 was made to the Atlanta Field Division Intelligence Group for information purposes (See Referral Section).

It was further determined that (b)(3) - 112 Public Law 55 125 Stat 552 (b)(6)

Referral # 2015-0016 was made to the Atlanta Field Division Intelligence Group for information purposes (See Referral Section).

Twenty (20) individuals were queried in MSS JUST/NCIC for prohibiting information. No prohibiting information was disclosed on these individuals.

8 – Trace Activity

The Violent Crime Analysis Branch (VCAB) FFL Master Query report was obtained for the three year period covering December 3, 2011 to December 31, 2014. The report revealed that the licensee had (b)(3) 112 firearm traces (including (b)(3) 112 duplicates) for the three year period. (b)(3) - 112 Public Law 55 125 Stat 552 (b)(3) 112 PL 55 125 STAT 552

An e-trace query indicates that (b)(3) 112 firearm traces were requested during the 12 month period of inspection. (b)(3) - 112 Public Law 55 125 Stat 552

An e-trace query disclosed that Ed's Pawn Shop, Inc. has had (b)(3) 112 total traces since

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

Twenty (20) firearms were queried in NCIC and E-trace. None of the firearms were disclosed to have been traced or stolen.

9 - NFA/Importer/Collector/Manufacturer

Ed's Pawn Shop, Inc. is licensed as a type 02 licensee, which is a dealer, including pawnbroker, in firearms other than destructive devices. Ed's Pawn Shop, Inc. has a (b)(3) 26 USC 6103

The licensee maintains a separate bound acquisition and disposition record for their NFA records. The A&D record was found to be in the proper format and all entries were found to be accurate and timely recorded.

A full inventory of NFA weapons was conducted. (b)(3) 26 USC 6103

A comparison of the NFRTR inventory listing to the physical NFA inventory disclosed (b)(3) 26 USC 6103.

(b)(3) - 26 USC 6103, (b)(6)

(b)(3) - 26 USC 6103, (b)(6)

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(b)(3) - 26 USC 6103, (b)(6)

(b)(3) - 26 USC 6103, (b)(6)

The licensee was found to have NFA registration and transfer forms /documentation on file for all NFA weapons in inventory.

Ed's Pawn Shop, Inc. does not conduct any importer, manufacturer or collector activities.

10 - Referrals

Four Referrals of Information were generated as part of this inspection and forwarded to ATF Atlanta VI (Intel) for intelligence purposes

(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)



11 – Other

Under current policy, revocation of the Federal Firearms License would be justified for a licensee who has previously been the subject of a warning conference (WC) within the last five years and the current inspection warrants another WC for a repeated similar violation.

During this inspection, it was disclosed that Ed's Pawn Shop, Inc., failed to file multiple sales reports when legally required to in (b)(3) 112 or more instances (b)(3) instances). This is a repeat violation which would require another WC. Although, the licensee had other repeat violations during the current inspection, the violations would only rise to the level of a Warning Letter (W/L).

Other repeat violations < 1% error rate

27 CFR 478.124(c)(1) - .5% (W/L)

27 CFR 478.124(c)(3)(i) - .4% (ROV)

27 CFR 478.124(c)(3)(iv) - .4% (ROV)

27 CFR 478.21a- .3% (ROV)

In regard to the multiple sales, the error rate has actually declined although the volume of multiple sales have increased when compared to the previous inspection.

Insp. 02/07/2011 - (b)(3) 112 multiple sales for Insp. / (b)(3) unreported multiple sales = 5%

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Insp. 01/12/2015 - (b)(3) multiple sales for Insp. / (b)(3) unreported multiple sales = 3%

Mr. Turner is initiating a new Standard Operating Procedure (SOP) as a result of this violation. A new report will be generated from his computerized A&D record every night showing all firearms transferred in the last five days. This will allow the managers on duty to determine if more than one handgun was transferred to the same individual within the past five business days. This report will be in addition to their current "Pawn Master" computer program that "flags" at the time of transfer any firearm sale to the same individual in the last five days. Mr. Turner has stated that as an incentive to make sure his employees follow these SOP's, he may initiate an employee suspension or termination program to set an example for the consequences of committing this violation. Mr. Turner had all of his employees attend the closing conference with IOI (b)(6) of February 17, 2015. He stated that he thought his employees might understand the importance of accurately completing and timely submitting the required ATF forms if they heard it from an ATF IOI directly.

Ed's Pawn Shop, Inc. had a large volume of firearm transactions during the period of inspection ((b)(4) acquisitions, (b)(4) dispositions) There were 3,117 firearms in inventory and (b)(3) - 112 FBI ATF Forms 4473 on file for the period of inspection. Ed's Pawn Shop, Inc. had (b)(3) traces in the last 12 month. All of these traces were successful. The licensee has an extremely good relationship with local, State and Federal police officers and agencies. The licensee also has a good productive relationship with ATF criminal enforcement.

Ed's Pawn Shop, Inc. has the Youth Handgun Safety Poster and the Youth Handgun Safety notices on hand. The licensee understands that a trigger lock must be provided to each transferee of a handgun if the handgun does not already have a trigger lock. No school zone was found to be within a 1000 foot vicinity of the licensee's business premises. No other findings were disclosed during the inspection.

12 - Closing Actions

On February 17, 2015 IOI (b)(6) held a closing conference with licensee, Ed's Pawn Shop, Inc. to review and discuss the results of the inspection. *(Because the conference occurred outside of the licensee's business hours in order for all employees to attend, IOI (b)(6) had Mr. Turner sign a "Consent to Inspect Outside Business Hours" document.)* In attendance at the conference representing the licensee, Ed's Pawn Shop, Inc., were Mr. Turner, Ms. Patrick, (b)(6), and (b)(6) as well as eight employees (sales associates). The violations recorded on the ATF Form 5030.5, Report of Violations (**attached**) were discussed with all of the employees of Ed's Pawn Shop, Inc. that were in attendance. The causes of the violations and the

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corrective actions were also discussed. The accurate completion of the ATF Forms 4473 and the ATF Forms 3310.4 were thoroughly discussed with all in attendance. IOI (b)(6) stressed the importance of accurately completing the ATF Form 4473. IOI (b)(6) answered all questions to the satisfaction of the attendees. The ATF Form 5030.5 was signed and dated by Mr. Turner. He was provided a copy for his records.

The Acknowledgement of Federal Firearm Regulations was reviewed with Mr. Turner. Emphasis was placed on the accurate and timely completion of the ATF Forms 3310.4. Mr. Turner signed the acknowledgement and stated that he had no further questions or topics he wanted to discuss (**Ref. Exhibit 130**). Mr. Turner stated that he will be adding more standard operating procedures so that the violations do not reoccur. Mr. Turner stated that all ATF Forms 3310.4's will be e-mailed to ATF in the future. The licensee stated that he had no further questions.

No reference material was provided to the licensee. IOI (b)(6) advised Mr. Turner that he could order the new 2014 Federal Firearms Regulations Reference Guide, ATF P 5300.4 from the ATF Distribution Center or Online. IOI (b)(6) provided Mr. Turner his business card in the event Mr. Turner or his employees have any questions.

13 - Violations

1. **27 CFR 478.125(e)**

Nature of Violation:

Failure to record the disposition of (b)(3) 112 PL 55 125 firearms in the Acquisition and Disposition record (A&D).

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

Licensee's Response:

Mr. Turner stated that this was the result of employee error in using the computer program Pawn Master. He stated that when a firearm purchase is delayed by NICS. All of the information on the purchaser is entered into the system and Pawn Master

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places the transaction in a "Hold" status. Once the transaction is approved, all the employee has to do is enter the date in the program and hit a key to release the firearm from a "hold" status and the A&D record is automatically updated. He stated that his employees just failed to release the firearm from hold. He stated that they do quarterly inventories and this a problem that they have seen happen in the past. Mr. Turner stated that it is usually caught when an inventory discrepancy report is printed out by the Pawn Master program. He stated that if ATF had come a week later after their regular quarterly inventory these discrepancies would have been found and fixed, because the unrecorded dispositions occurred in the last quarter. He apologized for the unrecorded dispositions and stated that he would put in procedures to possibly review the firearms in "hold status" on a monthly basis.

Corrective Action:

The licensee shall accurately and timely record the disposition of all firearms within seven (7) days from the date of the transfer. All dispositions were accounted for and recorded in the A&D record. No firearms were reported "missing" to ATF.

(Ref. Worksheet 1, Exhibits 1-5)

2. **7 CFR 478.124(c)(1) REPEAT OF VIOLATION CITED ON 01/12/2009 and 02/07/2011.**

Nature of Violation:

Failure to have the transferee accurately complete Section A of the ATF Form 4473, prior to the transfer of a firearm on (b)(3) 112 PL 55 125 STAT 552 ATF Forms 4473.

In (b)(3) 112 PL 55 125 instance, Section A, item 2 was incorrect. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instance, Section A, item 3 was incorrect. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instance, Section A, item 4 was blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instance, Section A, item 5 was blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instance, Section A, item 11d was blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instance, Section A, item 11g was blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instances, Section A, item 11h was blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instance, Section A, item 11k was blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instances, Section A, item 11l was blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instance, Section A, item 16 was blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 instance, Section A, item 16 was incorrect. (b)(3) 112 PL 55 125 STAT 552

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In (b)(3) 112 PL 55 125 instances, Section A, item 17 was blank. (b)(3) 112 PL 55 125 STAT 552

In (b)(3) 112 PL 55 125 STAT 552 instances, Section A, item 17 was incorrect. (b)(3) 112 PL 55 125 STAT 552

In (b)(3) 112 PL 55 125 instance, Section A, items 1-15 were completed by FFL employee. (b)(3) 112 PL 55 125

Licensee's Response:

Mr. Turner addressed all of the ATF Form 4473 violations by stating that he has numerous Standard Operating Procedures in place such as two secondary reviews of the ATF Form 4473's to catch any violations. Mr. Turner stated that he reviewed the forms with the violations to determine if any one employee was the cause but no one employee stood out. He stated that with his large volume of firearm transactions and with the large number of his employees, mistakes were going to happen. Mr. Turner stated that you cannot take human error out of the equation and get to zero errors. Mr. Turner stated that everyone makes an honest mistake. He stated that all he could do was try and get it as close to zero as possible. He stated that on many of the violations the error rate was less than one percent. Mr. Turner stated that he set-up all of the SOP's to stop the violations from occurring but it just comes down to employee error. Mr. Turner stated that is why he requested that all of his employees come to the closing conference so they can hear directly from ATF how important it was to have the ATF Form 4473's completed correctly. Mr. Turner stated that he welcomed any suggestions that could help him.

Corrective Action:

The licensee will have the transferee complete Section A of the ATF Form 4473 fully and accurately prior to the transfer of the firearm. The licensee will thoroughly review the ATF Form 4473 to ensure it is properly completed prior to the transfer of the firearm.

(Ref. Worksheet 2-4473[2012 Edition], Exhibits 6-34)

3. **27 CFR 478.124(c)(3)(i) REPEAT OF VIOLATION CITED ON 01/12/2009, 02/07/2011.**

Nature of Violation:

Failure to record on the ATF Form 4473 the identification document used to establish the place or residence of the transferee in (b)(3) 112 PL 55 125 S/A 1552 instances. In the case of transferees who were members of the Armed Forces on active duty and permanently

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stationed in Georgia and had a driver's license from another state, the licensee obtained and recorded on the ATF Form 4473 the transferee's out-of-State driver's license, the transferee's military orders showing their permanent duty station in Georgia but failed in (b)(3) 112 PL 55 125 STAT 552 instances to record the transferee's military identification card on the ATF Form 4473. (b)(3) 112 PL 55 125 STAT 552

In (b)(3) 112 PL 55 1 instance, a transferee presented an out- of-State driver's license and a Georgia Firearms License (GFL) with the current address. However, the GFL information was not recorded on the ATF Form 4473 as alternate documentation. (b)(3) 112 PL 55 125 STAT 552

Failure to record the correct information from the government identification document (expiration date) in (b)(3) 112 PL 55 1 instance. (b)(3) 112 PL 55 125 STAT 552

Licensee's Response:

Mr. Turner addressed all of the ATF Form 4473 he violations by stating that he has numerous Standard Operating Procedures in place such as two secondary reviews of the ATF Form 4473's to catch any violations. Mr. Turner stated that reviewed the forms with the violations to determine if any one employee was the cause but no one employee stood out. He stated that with his large volume of firearm transactions and with the large number of his employees, mistakes were going to happen. Mr. Turner stated that you cannot take human error out of the equation and get to zero errors. Mr. Turner stated that everyone makes an honest mistake. He stated that all he could do was try and get it as close to zero as possible. He stated that on many of the violations the error rate was less than one percent. Mr. Turner stated that he set-up all of the SOP's to stop the violations from occurring but it just comes down to employee error. Mr. Turner stated that is why he requested that all of his employees come to the closing conference so they can hear directly from ATF how important it was to have the ATF Form 4473's completed correctly. Mr. Turner stated that he welcomed any suggestions that could help him.

Corrective Action:

The licensee was advised that before a licensee may sell or deliver a firearm to a nonlicensee, the licensee must establish the identity, place of residence, and age of the buyer with a government issued photo identification and record on the ATF Form 4473 the type of I.D., number and expiration date in Item 20a.

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The licensee was advised that 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 will 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.

The licensee was advised to record the correct issuing authority and type of identification, identification number, and expiration date in item 20a.

The licensee was advised that in the case of an individual who's identification document does not show the current residence address, an alternate government issued document with the transferee's current residence address must be provided and recorded in item 20b.

Correct the ATF Form 4473 by making a copy of the ATF Form 4473, having the correction made on the copy, dating and initialing the corrections. The copy will then be stapled to the original ATF Form 4473.

(Ref. Worksheet 2-4473[2012 Edition], Exhibits 37-56)

4. 27 CFR 478.124(c)(3)(iv) REPEAT OF VIOLATION CITED ON 02/07/2011

Nature of Violation:

Failure 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 [REDACTED] ATF Forms 4473.

In [REDACTED] instance, Section B, item 21a was left blank. [REDACTED]
In [REDACTED] instances, Section B, item 21a was incorrect. [REDACTED] (b)(3) 112 PL 55 125 STAT 552
[REDACTED]
In [REDACTED] instances, Section B, item 21c was left blank. [REDACTED] (b)(3) 112 PL 55 125 STAT 552
[REDACTED]
In [REDACTED] instances, Section B, item 21d was left blank. [REDACTED] (b)(3) 112 PL 55 125 STAT 552
[REDACTED]

Licensee's Response:

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Mr. Turner addressed all of the ATF Form 4473 he violations by stating that he has numerous Standard Operating Procedures in place such as two secondary reviews of the ATF Form 4473's to catch any violations. Mr. Turner stated that reviewed the forms with the violations to determine if any one employee was the cause but no one employee stood out. He stated that with his large volume of firearm transactions and with the large number of his employees, mistakes were going to happen. Mr. Turner stated that you cannot take human error out of the equation and get to zero errors. Mr. Turner stated that everyone makes an honest mistake. He stated that all he could do was try and get it as close to zero as possible. He stated that on many of the violations the error rate was less than one percent. Mr. Turner stated that he set-up all of the SOP's to stop the violations from occurring but it just comes down to employee error. Mr. Turner stated that is why he requested that all of his employees come to the closing conference so they can hear directly from ATF how important it was to have the ATF Form 4473's completed correctly. Mr. Turner stated that he welcomed any suggestions that could help him.

Corrective Action:

The licensee was advised to comply with the requirements of 27 CFR 478.102 and record on the ATF Form 4473 the correct 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".

The licensee was advised on how to correct the ATF Form 4473 by making a copy of the ATF Form 4473, having the correction made on the copy, dating and initialing the corrections. The copy will then be stapled to the original ATF Form 4473.

(Ref. Worksheet 2-4473[2012 Edition], Exhibits 57-76)

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

Nature of Violation:

Failure to record the date or record the correct date on (b)(3) 112 PL 55 125 STAT 552 ATF Forms 4473.

In (b)(3) 112 PL 55 125 STAT 55 instances, Section D, item 36, the date transferred was left blank. (b)(3) 112 PL 55 125 STAT 552

In (b)(3) 112 PL 55 125 STAT 55 instances, Section D, item 36, the date transferred was incorrect. (b)(3) 112 PL 55 125 STAT 552

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Licensee's Response:

Mr. Turner addressed all of the ATF Form 4473 he violations by stating that he has numerous Standard Operating Procedures in place such as two secondary reviews of the ATF Form 4473's to catch any violations. Mr. Turner stated that reviewed the forms with the violations to determine if any one employee was the cause but no one employee stood out. He stated that with his large volume of firearm transactions and with the large number of his employees, mistakes were going to happen. Mr. Turner stated that you cannot take human error out of the equation and get to zero errors. Mr. Turner stated that everyone makes an honest mistake. He stated that all he could do was try and get it as close to zero as possible. He stated that on many of the violations the error rate was less than one percent. Mr. Turner stated that he set-up all of the SOP's to stop the violations from occurring but it just comes down to employee error. Mr. Turner stated that is why he requested that all of his employees come to the closing conference so they can hear directly from ATF how important it was to have the ATF Form 4473's completed correctly. Mr. Turner stated that he welcomed any suggestions that could help him.

Corrective Action:

The licensee was instructed to sign and date the ATF Form 4473 if they do not know or have reasonable cause to believe that the transferee is disqualified by law from receiving the firearm.

The licensee was advised how to correct the ATF Form 4473 by making a copy of the ATF Form 4473, having the correction made on the copy, dating and initialing the corrections. The copy will then be stapled to the original ATF Form 4473.

(Ref. Worksheet 2-4473[2012 Edition], Exhibits (b)(3) 112 PL 55)

6. 27 CFR 478.126a REPEAT OF VIOLATION CITED ON 02/07/2011

Nature of Violation:

Failure 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) 112 PL 55 instances. The licensee transferred two or more handguns to the same individual within a five business day period and failed to submit the ATF Form 3310.4 in (b)(3) 112 PL 55 instances. (b)(3) 112 PL 55 125 STAT 552

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Licensee's Response:

Mr. Turner stated that a couple of the unrecorded multiple sales were the result of the handgun transfers taking place on different days and being handled by different employees. He further stated that a couple of the unrecorded multiple sales were pawn transactions that were redeemed by a different individual than the person who had originally pawned the handguns. He said the employees did not realize that they had to submit a multiple sales report for these handgun transfers. Mr. Turner stated that he uses the pawn master computer program that alerts the employee when an individual buys more than one firearm. However, the program does not differentiate between long guns and handguns. He stated that he was very angry and upset, because he has Standard Operating Procedures (SOP) in place where certain employees at the store have a job to make sure that multiple sales forms are completed at the end of each day. He stated that he was paying them well to do a job that they are apparently not doing. Mr. Turner stated that he was going to fire an employee and suspend other employees to set an example that these violations were serious. Mr. Turner stated that he had his SOP's in place so that this did not happen and at the end of the day it was just his employees not following his instructions. He stated he was mad about this violation happening. He stated that his employees should know better. He stated that he provides each employee with a copy of the Federal Firearm Regulation Reference Guide, ATF P 5300.4. Mr. Turner produced a letter that each employee signs acknowledging receipt of the Guide and that they are responsible for knowing and learning the firearm laws and regulations. He apologized for the violations and stated that he would get control of the situation and do everything he can to make sure it does not happen again. Mr. Turner stated that Pawn Master has a report that can show all of the firearm sales for a period of time. He stated that he will have an employee look at the firearm sales report for the past five days each night to make sure all unrecorded multiples sales are completed and submitted.

Corrective Action:

Licensee was instructed to immediately prepare and submit an ATF F's 3310.4 for the unreported multiple sales. Licensee was advised that each licensee shall prepare a report of multiple sales, ATF F 3310.4, whenever the licensee sells or otherwise disposes of, at any one time or during 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. Licensee was further advised that the report shall be prepared on Form 3310.4, Report of multiple sales or other Disposition of Pistols or Revolvers.

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(Ref. Worksheet 2-4473[2012 Edition], Exhibits (b)(3) 112 PL 55 125 STAT 552)

7. 27 CFR 478.21(a) REPEAT OF VIOLATION CITED ON 01/12/2009, 02/07/2011

Nature of Violation:

Failure 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) 112 PL 55 125 STAT 552
ATF Forms 4473.

In (b)(3) 112 PL 55 125 STAT 552 instance, Section B, item 18 was left blank (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section B, item 18 was incorrect. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instances, Section B, item 24 was left blank. 14- (b)(3) 112 PL 55 125 STAT 552
(b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instances, Section B, item 25 was left blank (b)(3) 112 PL 55 125 STAT 552
(b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instances, Section D, item 30a was left blank. (b)(3) 112 PL 55 125 STAT 552
(b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section D, item 30a was incorrect. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instances, Section D, item 30b was blank. (b)(3) 112 PL 55 125 STAT 552
(b)(3) 112 PL 55 125 STAT 552

Licensee's Response:

Mr. Turner addressed all of the ATF Form 4473 violations by stating that he has numerous Standard Operating Procedures in place such as two secondary reviews of the ATF Form 4473's to catch any violations. Mr. Turner stated that he reviewed the forms with the violations to determine if any one employee was the cause but no one employee stood out. He stated that with his large volume of firearm transactions and with the large number of his employees, mistakes were going to happen. Mr. Turner stated that you cannot take human error out of the equation and get to zero errors. Mr. Turner stated that everyone makes an honest mistake. He stated that all he could do was try and get it as close to zero as possible. He stated that on many of the violations the error rate was less than one percent. Mr. Turner stated that he set-up all of the SOP's to stop the violations from occurring but it just comes down to employee error. Mr. Turner stated that is why he requested that all of his employees come to the closing conference so they can hear directly from ATF how important it was to have the ATF Form 4473's completed correctly. Mr. Turner stated that he welcomed any suggestions that could help him.

Corrective Action:

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The licensee was instructed to have all required information on ATF Forms 4473 completed in accordance with instructions /and headings on the form.

The licensee was advised to correct items in Sections B and D of ATF Form 4473 by making a copy of the ATF Form 4473, having the correction made on the copy, dating and initialing the corrections. The copy will then be stapled to the original ATF Form 4473.

(Ref. Worksheet 2-4473[2012 Edition], Exhibits (b)(3) 112 PL 55 125 STAT 552)

Signature	Title	Date of Report
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Trade Name: Ed's Public Safety

UI#: 760530-2014-0065-B1B
FFL#: 1-58-151-02-4B-39571

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



FIREARMS INSPECTION REPORT

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

UI#: 760530-2014-0065-B1B
FFL#: 1-58-151-02-4B-39571

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



FIREARMS INSPECTION REPORT

Name: Ed's Pawn Shop, Inc.
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(b)(3) 112 PL 55 125 STAT 552



FIREARMS INSPECTION REPORT

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

UI#: 760530-2014-0065-B1B
FFL#: 1-58-151-02-4B-39571

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



FIREARMS INSPECTION REPORT

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

UI#: 760530-2014-0065-B1B
FFL#: 1-58-151-02-4B-39571

4473 #14-2359.

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




FIREARMS INSPECTION REPORT

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

UI#: 760530-2014-0065-B1B
FFL#: 1-58-151-02-4B-39571

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



EXHIBIT 126- Copies of  ATF F's 3310.4 that were found to be attached to the ATF F 4473 but not listed on the VCAB FFL History Query

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



EXHIBIT 130- Acknowledgement of Federal Firearms Regulations dated 2/17/2015.



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Atlanta, Georgia 30345

JUL 3 0 2015

www.atf.gov

760530: (b)(3) 112 PL 55 125 STAT
5373

Mr. Grady Turner, President
Ed's Public Safety
4431 N. Henry Boulevard
Stockbridge, Georgia 30281

1-58-151-02-4B-39571

Dear Mr. Turner:

During a recent compliance inspection at your firearms business covering the period of January 12, 2014 through January 12, 2015, you were cited for violations of 27 Code of Federal Regulations, Part 478. The violations were discussed with you during the inspection. A copy of the Report of Violations, Form 5030.5, issued at the time of the inspection is enclosed.

You should be aware that any willful violations of the Gun Control Act may result in revocation of your Federal firearms license. As a result of the recently cited violations, it is important that we have a meeting with you to discuss the violations found. The conference will be held on August 10, 2015, at 1:00 pm, at 2600 Century Parkway NE, Atlanta, Georgia 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 with you documentation verifying the corrective action you have taken.

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

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

Mr. Grady Turner, President
Ed's Public Safety

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

Sincerely yours,

(b) (6)

Acting DFO

JDM
Diana D. Mitchell
Director, Industry Operations
Atlanta Field Division

Enclosure

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

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 8 Pages
License/Permit/Registry Number (If any) 158151024839571		Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015			

Inspection Results

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

Number: 1

Nature of Violation:

Failure to record the disposition of (b)(3) 112 firearms in the Acquisition and Disposition record (A&D).

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

Citation: 27 CFR 478.125(e)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee shall accurately and timely record the disposition of all firearms within seven (7) days from the date of the transfer. All dispositions were accounted for and recorded in the A&D record. No firearms were reported "missing" to ATF.

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 30281-	County Henry	Page 2 of 8 Pages
License/Permit/Registry Number (if any) 158151024B39571		Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015			

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:

Failure to have the transferee accurately complete Section A of the ATF Form 4473, prior to the transfer of a firearm on (b)(3) 112 PL 55 125 STAT 552 ATF Forms 4473.

In (b)(3) 112 PL 55 125 STAT 552 instance, Section A, item 2 was incorrect (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section A, item 3 was incorrect (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section A, item 4 was blank (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section A, item 5 was blank (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section A, item 11d was blank (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section A, item 11g was blank (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instances, Section A, item 11h was blank (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section A, item 11k was blank (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instances, Section A, item 11l was blank (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section A, item 16 was blank (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instance, Section A, item 16 was incorrect (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 STAT 552 instances, Section A, item 17 was blank (b)(3) 112 PL 55 125 STAT 552

In (b)(3) 112 PL 55 125 STAT 552 instances, Section A, item 17 was incorrect (b)(3) 112 PL 55 125 STAT 552

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

In (b)(3) instance, Section A, items 1-15 were completed by FFL employee (b)(3) 112 PL 55 125 STAT 552

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

Corrective Action to be Taken: The licensee will have the transferee complete Section A of the ATF Form 4473 fully and accurately prior to the transfer of the firearm. The licensee will thoroughly review the ATF Form 4473 to ensure it is properly completed prior to the transfer of the firearm.

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 4434 N. Henry Boulevard	City Stockbridge	State GA	Zip Code 30281-	County Henry	Page 3 of 8 Pages
License/Permit/Registry Number (if any) 158151024B39571	Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015				

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)(1)

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 4 of 8 Pages
License/Permit/Registry Number (If any) 158151024B39571	Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015				

Inspection Results

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

Number: 3

Nature of Violation:

Failure to record on the ATF Form 4473 the identification document used to establish the place of residence of the transferee in (b)(3) 112 PL 55 12 instances.

In the case of transferees who were members of the Armed Forces on active duty and permanently stationed in Georgia and had a driver's license from another state, the licensee obtained and recorded on the ATF Form 4473 the transferee's out-of-State driver's license, the transferee's military orders showing their permanent duty station in Georgia but failed in (b)(3) 112 PL 55 125 instances to record the transferee's military identification card on the ATF Form

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

In (b)(3) 112 instance, a transferee presented an out-of-State driver's license and a Georgia Firearms License (GFL) with the current address. However, the GFL information was not recorded on the ATF Form 4473 as alternate documentation (b)(3) 112 PL 55 125 STAT 552

Failure to record the correct information from the government identification document (expiration date) in (b)(3) 112 instance (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 was advised that before a licensee may sell or deliver a firearm to a nonlicensee, the licensee must establish the identity, place of residence, and age of the buyer with a government issued photo identification and record on the ATF Form 4473 the type of I.D., number and expiration date in item 20a.

The licensee was advised that 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 will list the the buyer's military identification card and official orders showing where his or her permanent duty station is located in response to question 20a.

The licensee was advised to record the correct issuing authority and type of identification, identification number, and expiration date in item 20a.

The licensee was advised that in the case of an individual who's identification document does not show the current residence address, an alternate government issued document with the transferee's current residence address must be

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 30281-	County Henry	Page 5 of 8 Pages
License/Permit/Registry Number (If any) 158151024B30571		Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015			

Inspection Results

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

provided and recorded in item 20b.

Correct the ATF Form 4473 by making a copy of the ATF Form 4473, having the correction made on the copy, dating and initialing the corrections. The copy will then be stapled to the original ATF Form 4473.

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

Number: 4

Nature of Violation:

Failure 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" or (b)(3) 112 PL 55 ATF Forms 4473

In (b)(3) 112 PL instances, Section B, item 21a was left blank (b)(3) 112 PL 55
In (b)(3) 112 PL 55 instances, Section B, item 21a was incorrect. (b)(3) 112 PL 55 125 STAT 552
(b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL instances, Section B, item 21c was left blank (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL instances, Section B, item 21d was left blank (b)(3) 112 PL 55 125 STAT 552

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

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

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

The licensee was advised to comply with the requirements of 27 CFR 478.102 and record on the ATF Form 4473 the correct 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".

The licensee was advised on how to correct the ATF Form 4473 by making a copy of the ATF Form 4473, having the correction made on the copy, dating and initialing the corrections. The copy will then be stapled to the original ATF Form 4473.

Report of Violations

Instructions

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

Name of Proprietor 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 6 of 8 Pages
License/Permit/Registry Number (If any) 158151024D39571		Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015			

Inspection Results

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

Number: 5

Nature of Violation:

Failure to record the date or record the correct date on (b)(3) 112 PL 55 125 STAT ATF Form 4473.

In (b)(3) 112 PL 55 instances, Section D, item 36, the date transferred was left blank. (b)(3) 112 PL 55

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

In (b)(3) 112 PL 55 instances, Section D, item 36, the date transferred was incorrect. (b)(3) 112 PL 55

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

Citation: 27 CFR 478.124(c)(5)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee was instructed to sign and date the ATF Form 4473 if they do not know or have reasonable cause to believe that the transferee is disqualified by law from receiving the firearm.

The licensee was advised how to correct the ATF Form 4473 by making a copy of the ATF Form 4473, having the correction made on the copy, dating and initialing the corrections. The copy will then be stapled to the original ATF Form 4473.

Report of Violations

Instructions

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

Name of Proprietor 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 7 of 8 Pages
License/Permit/Registry Number (If any) 1581510241139571	Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015				

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:

Failure 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) 112 PL 55 instances. The licensee transferred two or more handguns to the same individual within a five business day period and failed to submit the ATF Form 3310.4 in (b)(3) 112 PL 55 instances (b)(3) 112 PL 55

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee was instructed to immediately prepare and submit an ATF F's 3310.4 for the unreported multiple sales. Licensee was advised that each licensee shall prepare a report of multiple sales, ATF F 3310.4, whenever the licensee sells or otherwise disposes of, at any one time or during 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. Licensee was further advised that the report shall be prepared on Form 3310.4, Report of multiple sales or other Disposition of Pistols or Revolvers.

Citation: 27 CFR 478.126a

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 8 of 8 Pages
License/Permit/Registry Number (if any) 158151024B39571		Expiration Date 2/1/2017	Date(s) or Period of Inspection 01/12/2014 through 01/12/2015			

Inspection Results

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

Number: 7

Nature of Violation:

Failure to 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) 112 PL 55 125 ATF Forms 4473

In (b)(3) 112 PL 55 125 PL 5 instance, Section B, item 18 was left blank.
In (b)(3) 112 PL 55 125 PL 5 instance, Section B, item 18 was incorrect.
In (b)(3) 112 PL 55 125 PL 5 instance, Section B, item 24 was left blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 PL 5 instance, Section B, item 25 was left blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 PL 5 instance, Section D, item 30a was left blank. (b)(3) 112 PL 55 125 STAT 552
In (b)(3) 112 PL 55 125 PL 5 instance, Section D, item 30a was incorrect. (b)(3) 112 PL 5
In (b)(3) 112 PL 55 125 PL 5 instance, Section D, item 30b was blank. (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 was instructed to have all required information on ATF Forms 4473 completed in accordance with instructions /and headings on the form.

The licensee was advised to correct items in Sections B and D of ATF Form 4473 by making a copy of the ATF Form 4473, having the correction made on the copy, dating and initialing the corrections. The copy will then be stapled to the original ATF Form 4473

Citation: 27 CFR 478.21(n)

I Have Received a Copy of This Report of Violations (Proprietor's signature and title)	Date
Signature and Title of ATF Officer	Date

For Official Use Only

ATF E-Form 5030.5
Revised April 2005



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Atlanta, Georgia 30345

AUG 11 2015
www.atf.gov

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5373

Mr. Ed Turner
Ed's Pawn Shop, Inc. d/b/a Ed's Public Safety
4431 North Henry Boulevard
Stockbridge, Georgia 30281

1-58-151-02-4B-39571

Dear Mr. Turner:

This letter is a follow-up to the warning conference held with you on August 10, 2015 at the Atlanta Field Division's Office located at 2600 Century Parkway, NE Atlanta, Georgia 30345. During this conference, the violations cited during the inspection covering the period January 12, 2014 to January 12, 2015, and the necessary corrective action to prevent the violations from recurring were discussed.

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

Regarding Violations # 1 where you failed to record the disposition of (b)(3) 112 firearms in the Acquisition & Disposition record book. You stated that the errors were due to the employees' failure to complete the recording of transfer of the gun in your computer system, after the end of a holding period to delay the sale of the gun. You stated that all of your employees have been reminded to click the computer button to reflect the transfer of a gun once the disposition of the firearm has taken place.

Regarding Violations # 2, 4, 5 and 7 where you failed to obtain complete and accurate information on the ATF Forms 4473 in accordance with the instructions on the form. You stated that there will be several reviews of the forms. In particular, two reviews of the forms will take place before the transfer of the gun from the store; a third review of the forms will take place at the end of the day, and a fourth review of the forms will take place on a monthly basis.

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

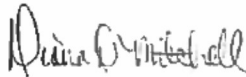
Regarding Violation # 3 where you failed to obtain sufficient identification to properly verify the transferee's identity and residence address, as the identification document used to establish the place or residence of the transferee was not recorded on the ATF Form 4473 in (b)(3) instances. You stated that you make copies of all the identifying information and keep them filed away; however, you will ensure the employees are documenting the required information on the ATF Forms 4473 as required.

Regarding Violation # 6 where you failed to timely submit a report of multiple sale, ATF 3310.4, no later than the close of business on the day that the multiple sale or other disposition occurred in (b)(3) instances. You stated that your computer software has been assessed to detect a multiple sale and to ensure a form is generated and submitted via email to ATF by your employees.

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, Group V (10)
Federal Firearms Licensing Center