

## Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY)  Martin B. Retting, Inc. 11029 W. Washington Blvd. Culver City, CA 90232, Los Angeles	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) <p style="text-align: center;">784025-2014-0246-B1B</p> 3. PERMIT/LICENSE NUMBER    4a. TARGET DATE    4b. TARGET HOURS <p style="text-align: center;">995037088C24990</p> 5. REQUESTED BY (SIGNATURE, TITLE AND DATE)
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6. ATF OFFICER(S) ASSIGNED

- (b)(6) Lead Investigator
- (b)(6) - Assigned 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, 10/02/2013

8. PURPOSE/SPECIAL INSTRUCTIONS  
 Please conduct a compliance inspection.

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC	10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	7	NO. OF REFERRALS		2111 - PER DIEM
NO. OF TECS CHECKS		NO. OF TECS HITS		2112 - P.O.A.
NO. OF TAX ADJUSTMENTS		\$ VALUE OF TAX INCREASES		2113 - COMM. AIR
		\$ VALUE OF TAX DECREASES		2114 - RENTAL CAR
NO. OF ASSESSMENTS		\$ VALUE OF ASSESSMENTS		2115 - GPV EXPENSES
NO. OF CLAIMS		\$ VALUE OF CLAIMS		2116 - MISC.
NO. OF TAX PERIODS		\$ VALUE OF TAXES VERIFIED		TOTAL \$ FOR INSP.

11. ATF OFFICER'S RECOMMENDATION

Submitted by (b)(6) - Industry Operations Investigator

Submitted on: 09/16/2015  
 Seven violations were cited on ATF Form 5030.5, Report of Violations:

27 CFR 478.125(e) for failing to timely enter the acquisition of (b)(7) firearms and the disposition of (b)(7) firearms into the A & D Record. Out of the (b)(7) dispositions the licensee was unable to account for (b)(3) - 112 PUBLIC of the firearms and failing to accurately enter (b)(3) correct acquisition information (Serial Number) into the A & D Record and

27 CFR 478.126a for failing to report multiple sales or other dispositions of handguns on (b)(7) transactions involving (b)(7) handguns to ATF.

27 CFR 478.21(a) for failing to follow the instructions on (b)(3) ATF Form 4473, pertaining to completing ATF Forms 4473.

27 CFR 478.124(c)(1) for failing to ensure the transferee completed (b)(7) ATF Forms 4473 Section A, prior to transferring a firearm to a nonlicensee.

27 CFR 478.124(c)(3)(i) for failing to verify the identity of the transferee by examining the identification document and verifying the correct information is reflected on (b)(7) ATF Forms 4473.

27 CFR 478.124(c)(5) The transferor failed to sign and date ATF Form 4473, prior to transferring a firearm to a nonlicensee.

27 CFR 478.99 (c) (b)(3) - 111 firearm was transferred to a transferee, when the licensee had reasonable cause to believe the transferee was prohibited, because the transferee answered "Yes" on ATF Form 4473 Section A #12. The transferee was not prohibited.

(b)(3) - 111 violation cited 27 CFR 478.125(e) merits a Warning Letter. Recommend a Report of Violations, Warning Letter and a recall inspection.

Viols WL ONLY and Recall Inspection

**12. TIME ACCOUNTING DATA**

ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)
MAY 2015	88.00
JUN 2015	36.00
AUG 2015	60.00

## Assignment and Report

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	3. PERMIT/LICENSE NUMBER 995037088C24990
	4a. TARGET DATE 4b. TARGET HOURS
5. REQUESTED BY (SIGNATURE, TITLE AND DATE)	

### 12. TIME ACCOUNTING DATA

ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)		
SEP 2015	37.00		
ATF OFFICER'S SUBTOTAL	221.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)		
JUN 2015	6.00		
ATF OFFICER'S SUBTOTAL	6.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)		
MAY 2015	14.00		
ATF OFFICER'S SUBTOTAL	14.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)		
MAY 2015	24.00		
ATF OFFICER'S SUBTOTAL	24.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)		
MAY 2015	40.00		
ATF OFFICER'S SUBTOTAL	40.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)		
MAY 2015	32.00		
JUN 2015	42.00		
ATF OFFICER'S SUBTOTAL	74.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	379.00		

### 13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION  
 Viols WL ONLY and Recall Inspection

REVIEWED     
  CONCUR     
  SEE COMMENTS     
  FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6) - Area Supervisor	REVIEW DATE 09/16/2015
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ROUTING SEQUENCE AND DATE

- 1. \_\_\_\_\_
- 2. \_\_\_\_\_
- 3. \_\_\_\_\_
- 4. \_\_\_\_\_

CONTROL FILE POSTED DATE \_\_\_\_\_

## Report of Violations

### Instructions

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

Name of Proprietor Martin B. Retting, Inc.	Street Address 11029 W. Washington Blvd.	City Culver City	State CA	Zip Code 90232-	County Los Angeles	Page 1 of 3 Pages
License/Permit/Registry Number <i>(If any)</i> 995037085C24990	Expiration Date 3/1/2015	Date(s) or Period of Inspection 05/01/2014 through 05/12/2015				

### 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:**

Failed to timely enter the acquisition of [REDACTED] firearms and the disposition [REDACTED] firearms into the A & D Record. Out of the [REDACTED] dispositions the licensee was unable to account for [REDACTED] of the firearms. [REDACTED] FW

Failed to accurately enter [REDACTED] correct acquisition information (Serial Number) into the A & D Record. [REDACTED] FW

Citation: 27 CFR 478.125(e)

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

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

Licensee will enter all [REDACTED] acquisitions and [REDACTED] dispositions into the A & D Records and will ensure all acquisitions and dispositions are timely entered into the A & D Record. The licensee will report the missing [REDACTED] firearms to the local authorities and to ATF. [REDACTED] FW

Number: 2

**Nature of Violation:**

Failed to report multiple sales or other dispositions of handguns or [REDACTED] transactions involving [REDACTED] handguns to ATF. [REDACTED]

Citation: 27 CFR 478.126a

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

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

The licensee will complete ATF Forms 3310.4 for the [REDACTED] multiple sales of handguns and will ensure ATF Forms 3310.4 are completed when two or more handguns are transferred to a nonlicensee within 5 consecutive business days. [REDACTED]

## 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 Martin B. Retting, Inc.	Street Address 11029 W. Washington Blvd.	City Culver City	State CA	Zip Code 90232-	County Los Angeles	Page 2 of 3 Pages
License/Permit/Registry Number <i>(if any)</i> 995037085C24990	Expiration Date 3/1/2015	Date(s) or Period of Inspection 05/01/2014 through 05/12/2015				

### 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:**

<sup>(b)(3) - (1)(2) P</sup> Firearm was transferred to a transferee, when the licensee had reasonable cause to believe the transferee was prohibited, because the transferee answered "Yes" on ATF Form 4473 Section A #12. The transferee was not prohibited.

**Citation:** 27 CFR 478.99(c)

**Date Corrections to be Made:**

*(If not corrected immediately)*

**Corrective Action to be Taken:** Licensee will contact the transferee either by telephone or Certified Mail requesting the transferee comes to the business premise to correct ATF Forms 4473.

*(If not corrected immediately)*

**Number:** 4

**Nature of Violation:**

The transferor failed to sign and date ATF Form 4473, prior to transferring a firearm to a nonlicensee.

**Citation:** 27 CFR 478.124(c)(5)

**Date Corrections to be Made:**

*(If not corrected immediately)*

**Corrective Action to be Taken:** The licensee will ensure the transferor signs and dates ATF Forms 4473, prior to transferring a firearm to a nonlicensee.

*(If not corrected immediately)*

# Report of Violations

### Instructions

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

Name of Proprietor Martin B. Retting, Inc.	Street Address 11029 W. Washington Blvd.	City Culver City	State CA	Zip Code 90232-	County Los Angeles	Page 3 of 3 Pages
License/Permit/Registry Number (If any) 995037085C24990	Expiration Date 3/1/2015	Date(s) or Period of Inspection 05/01/2014 through 05/12/2015				

### 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:** Failed to verify the identity of the transferee by examining the identification document and verifying the correct information is reflected on ATF Forms 4473.  
**Citation:** 27 CFR 478.124(c)(3)(i)
- Date Corrections to be Made:**  
*(If not corrected immediately)*
- Corrective Action to be Taken:** The licensee will document the identification used to identify the transferee and the correct information including the name is reflected on ATF Forms 4473.  
*(If not corrected immediately)*
- 
- Number:** 6  
**Nature of Violation:** Failed to ensure the transferee completed ATF Forms 4473 Section A, prior to transferring a firearm to a nonlicensee.  
**Citation:** 27 CFR 478.124(c)(1)
- Date Corrections to be Made:**  
*(If not corrected immediately)*
- Corrective Action to be Taken:** The licensee will ensure the transferee completes ATF Forms 4473, prior to transferring a firearm to a nonlicensee.  
*(If not corrected immediately)*
- 
- Number:** 7  
**Nature of Violation:** Failed to follow the instructions of ATF Form 4473, pertaining to completing ATF Forms 4473.  
**Citation:** 27 CFR 478.21(a)
- Date Corrections to be Made:**  
*(If not corrected immediately)*
- Corrective Action to be Taken:** The licensee will ensure that all ATF Forms 4473 are completed accurately per the instructions on the form, prior to transferring a firearm to a nonlicensee.  
*(If not corrected immediately)*

I Have Received a Copy of This Report of Violations (Proprietor's signature and title) 	Date 9-9-15
Signature and Title of ATF Officer  Investigator	Date 9-9-15

# FIREARMS INSPECTION REPORT

**Name:** Martin B. Retting, Inc.      **UI#:** 784025-2014-0246-B1B  
**Trade Name:**      **FFL#:** 9-95-037-08-24990

**Address:** 11029 West Washington Blvd.  
Culver City, CA 90232

## 1 - Introduction

### Inspection Profile:

On May 12, 2015, Investigator (b)(6) conducted a compliance investigation incorporating trafficking detection strategies from the Disposition Emphasis Inspection Program. The licensee interviewed was Robert Retting, Vice President & Responsible Person at the business premises located at 11029 W. Washington Blvd. Culver City, CA 90232. The period covered under this inspection was from May 1, 2014 to May 12, 2015. No advance notification was given prior to this investigation.

Investigator (b)(6) identified Robert Joel Retting, Vice President by his CA Driver's License (b)(6) 1 with a Date of Birth of (b)(6)

### Business Profile:

Martin B. Retting, Inc. has had a Federal Firearms License since 1969. In 1984, Martin B. Retting, Inc. has had a Federal Firearms Importer's License.

Martin B. Retting, Inc. has a Federal Firearms Importer's License during this inspection period the licensee has not imported any firearms or firearms components. Martin B. Retting, Inc. is a high volume retail firearms dealer. At the business premises the licensee also sells firearm accessories and ammunition.

The licensee is mainly selling new and used handguns, longguns and receivers to nonlicensees and occasionally to law enforcement and to other licensees. The licensee also conducts consignment sales, gunsmithing activities and internet sales. The licensee does not conduct any activities at gun shows or other events.

In the last 12 months the licensee has acquired approximately (b)(4) firearms and has transferred (b)(4) firearms to nonlicensees. The licensee is maintaining the physical inventory on the business premises. The licensee does not have any off-site storage. The business premises has a security system and metal gates on the windows.

Martin B. Retting's main suppliers are (b)(4)

. The licensee also obtains guns from nonlicensees for private party sales and consignment sales.

# FIREARMS INSPECTION REPORT

Name: Martin B. Retting, Inc.  
Trade Name:

UI#: 784025-2014-0246-B1B  
FFL#: 9-95-037-08-24990

The business premises is a commercial location owned by the Martin Retting Trust. Martin B. Retting Inc. is leasing the business premises from the family Trust (Martin Retting Trust). The licensee is in compliance with all State and local licensing requirements: Seller's Permit # SR AS 18082322; Certificate of Eligibility # 684; CA CFD # 12814; CA Assault Weapons Permit # 03624; Culver City Secondhand Dealer Permit # 1918-1004; Culver City Retail Firearms Permit # 010093; Culver City Business Tax Certificate (b)(3) - 26 USC 6103.

The licensee also has a Federal Explosive License # 9-CA-037-29-00007 located at business premises to sell black powder (See UI # 784025-2014-0377-B2A). The licensee is in compliance with the Local licensing requirements for the Federal Explosives License: Culver City Fire Permit # 2013-150.

## Ownership and Control:

Martin B. Retting, Inc. is a CA Corporation. The corporate officers are Daniel Retting, President, and Robert Retting, Vice President. There has been no changes in ownership or in the trade name. No indication of hidden or undisclosed ownership was disclosed.

## Variance:

The licensee has an ATF approved variance to maintain a computerized Acquisitions and Disposition Record. Investigator (b)(6) asked the licensee if their computerized A & D Record tracks changes or corrections made to any entries. The licensee indicated when they make any changes or corrections to an entry they would delete the original entry and create a new entry in the computerized A & D Record. Investigator (b)(6) gave the licensee a copy of ATF Ruling 2013-5, Electronic Recordkeeping Requirements and advised the licensee that they are required to comply with ATF Ruling 2013-5 and be able to track all changes and corrections made to the computerized A & D Record and will comply with not deleting any entries in the A & D Record. Robert Retting indicated that they will not delete any changes or corrections and will note in the disposition section the entry is invalid and note the change or correction and enter a new entry into the A & D Record.

No new variance requests were received during this inspection.

## 2 - Recommendation

Seven violations were cited on ATF Form 5030.5, Report of Violations:

27 CFR 478.125(e) for failing to timely enter the acquisition of (b)(7)(D) firearms and the disposition of (b)(7)(D) firearms into the A & D Record. Out of the (b)(7)(D) dispositions the licensee was unable to account for (b)(3) - 112 Public Law 9 of the firearms and failing to accurately

# FIREARMS INSPECTION REPORT

**Name:** Martin B. Retting, Inc.  
**Trade Name:**

**UI#:** 784025-2014-0246-B1B  
**FFL#:** 9-95-037-08-24990

enter (b)(3) correct acquisition information (Serial Number) into the A & D Record and 27 CFR 478.126a for failing to report multiple sales or other dispositions of handguns on (b)(3) transactions involving (b)(3) handguns to ATF.  
27 CFR 478.21(a) for failing to follow the instructions on (b)(3) ATF Form 4473, pertaining to completing ATF Forms 4473.  
27 CFR 478.124(c)(1) for failing to ensure the transferee completed (b)(3) ATF Forms 4473 Section A, prior to transferring a firearm to a nonlicensee.  
27 CFR 478.124(c)(3)(i) for failing to verify the identity of the transferee by examining the identification document and verifying the correct information is reflected on (b)(3) ATF Forms 4473.  
27 CFR 478.124(c)(5) The transferor failed to sign and date ATF Form 4473, prior to transferring a firearm to a nonlicensee.  
27 CFR 478.99 (c) (b)(3)-(112) firearm was transferred to a transferee, when the licensee had reasonable cause to believe the transferee was prohibited, because the transferee answered "Yes" on ATF Form 4473 Section A #12. The transferee was not prohibited.  
(b)(3)-(112) violation cited 27 CFR 478.125(e) merits a Warning Letter. Recommend a Report of Violations, Warning Letter and a recall inspection.

### 3 - Inspection History

**Date and Type of Inspection:** May 7, 2012, Theft/Loss Investigation  
**UI#:** 784025-2012-0040-B1B

**Inspection Results:**

A theft occurred at the licensee's business premises (b)(3) - 112 Public Law 55 125 Stat 552 handguns were reported stolen to ATF and to the local authorities. Recommended no violations, no further action and no referrals.

**Cited Violations:**

No violations were cited.

**Date and Type of Inspection:** July 27, 2010, Assisting LE  
**UI#:** 784025-2010-0416-B1B



# FIREARMS INSPECTION REPORT

**Name:** Martin B. Retting, Inc.  
**Trade Name:**

**UI#:** 784025-2014-0246-B1B  
**FFL#:** 9-95-037-08-24990

## Inspection Results:

Information requested by Special Agent obtained and forwarded. Recommended no violations, no further action, and no referrals.

**Cited Violations:** No violations cited.

**Date and Type of Inspection:** April 7, 2009 Compliance Inspection  
**UI#:** 784015-2009-238-B1B

## Inspection Results:

The licensee was cited three violations on ATF Form 5030.5, Report of Violations. Recommended Violations ROV Only No recall Inspection.

## Cited Violations:

27CFR 478.126a, failed to report (b)(3) - 11 multiple sale or other disposition of pistols and revolvers on ATF Form 3310.4; 27 CFR 478.124(c)(3)(ii) failed to obtain correct or complete proof of 90 days residency documentation; 27 CFR 478.124(c)(1) failed to ensure that the transferee completed ATF Form 4473 accurately and completely.

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

In the last 12 months the licensee has acquired approximately (b)(4) firearms and has transferred (b)(4) firearms to nonlicensees.

The licensee had four thousand five hundred and ten (4510) firearms in their physical inventory during this inspection. Investigators (b)(6) conducted a physical inventory and compared the inventory to the licensee's A & D Record. The following violations were cited on ATF Form 5030.5, Report of Violations: 27 CFR 478.125(e) Failed to enter (b)(3) correct serial numbers into the A & D Record; failed to timely enter (b)(3) acquisitions and (b)(3) dispositions into the A & D Record and the licensee was unable to determine the disposition of (b)(3) - 112 Public Law firearms. Investigator (b)(6) advised the licensee to report the (b)(3) - 112 Public Law firearms as missing to the local authorities and to ATF. On September 9, 2015, Investigator (b)(6) verified the licensee reported the missing firearms to the local authorities and to ATF.

## FIREARMS INSPECTION REPORT

**Name:** Martin B. Retting, Inc.  
**Trade Name:**

**UI#:** 784025-2014-0246-B1B  
**FFL#:** 9-95-037-08-24990

The licensee is maintaining the inventory on the business premises. The licensee does not have any off-site storage. The licensee is maintaining the required records on the business premises. The licensee is using a computerized A & D Record.

Investigator (b)(6) asked the licensee if their computerized A & D Record tracks changes or corrections made to any entries. The licensee indicated when they make any changes or corrections to an entry they would delete the original entry and create a new entry in the computerized A & D Record. Investigator (b)(6) gave the licensee a copy of ATF Ruling 2013-5, Electronic Recordkeeping Requirements and advised the licensee that they are required to comply with ATF Ruling 2013-5 and be able to track all changes and corrections made to the computerized A & D Record and will comply with not deleting any entries in the A & D Record. Robert Retting indicated that they will not delete any changes or corrections and will note in the disposition section the entry is invalid and note the change or correction and enter a new entry into the A & D Record.

The licensee has been maintaining a separate record for his gunsmithing activities in a bound A & D Record. The gunsmithing A & D Record is not in the proper format. Investigator (b)(6) advised the licensee the proper format to use for their gunsmithing A & D Record. During this inspection, the licensee started using his computerized A & D Record for his gunsmithing activities. The licensee will be using the same program, but will have a separate record for his gunsmithing activities.

During this inspection period the licensee has not reported any theft or losses of firearms. Investigator (b)(6) advised the licensee to contact the local law enforcement authority and ATF within 48 hours from the time the stolen or missing firearms are detected.

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

In the last 12 months the licensee has sold approximately (b)(4) firearms to nonlicensees. Investigators (b)(6) reviewed 100% of ATF Forms 4473 for the examination period. The following violations were cited on ATF Form 5030.5, Report of Violations: 27 CFR 478.21(a) for failing to follow the instructions on (b)(3) ATF Form 4473, pertaining to completing ATF Forms 4473; 27 CFR 478.124(c)(1) for failing to ensure the transferee completed (b)(3) ATF Forms 4473 Section A, prior to transferring a firearm to a nonlicensee; 27 CFR 478.124(c)(3)(i) for failing to verify the identity of the transferee by examining the identification document and verifying the correct information is reflected on (b)(3) ATF Forms 4473; 27 CFR 478.124(c)(5) The transferor failed to sign and date ATF Form 4473, prior to

# FIREARMS INSPECTION REPORT

**Name:** Martin B. Retting, Inc.  
**Trade Name:**

**UI#:** 784025-2014-0246-B1B  
**FFL#:** 9-95-037-08-24990

transferring a firearm to a nonlicensee; 27 CFR 478.99 (c) (b)(3)-112 firearm was transferred to a transferee, when the licensee had reasonable cause to believe the transferee was prohibited, because the transferee answered "Yes" on ATF Form 4473 Section A #12. The transferee was not prohibited. Investigator (b)(6) discussed the violations/errors found and advised the licensee to verify ATF Forms 4473 are complete and accurate prior to transferring a firearm to a nonlicensee.

The licensee is filing ATF Forms 4473 in numerical order. The licensee is properly documenting sales to law enforcement officers, by having the law enforcement officers complete ATF Forms 4473 and attaching a letter from the Police Department.

The licensee has been documenting all transfers to other licensees and either obtaining a certified copy of the other licensee's FFL and/or verifying the licensee by the FFL EZ check.

The licensee has been maintaining a separate file, when the NICS check has been completed and the transaction was denied or cancelled for five years.

California is a Point of Contact State for NICS checks. The licensee maintains the California Dealer Record of Sales (DROS) Form on the business premises. Investigator Woods requested from CA Department of Justice a list of DROS transactions for this licensee. Investigator (b)(6) verified 98 NICS checks with the list of DROS transactions. No discrepancies noted. The licensee is properly conducting NICS checks and documenting the NICS information on ATF Forms 4473.

## **6 – Multiple Sales**

The Violent Crime Analysis Branch Firearms Trace History indicated (b)(3)-11 multiple sales, during this inspection period. The licensee had (b)(3)-11 unreported multiple sales, during this inspection period involving (b)(3) handguns. The violations was cited on ATF Form 5030.5, Report of Violations: 27 CFR 478.126a for failing to report multiple sales or other dispositions of handguns on (b)(3) transactions involving (b)(3) handguns to ATF.

## **7 – Suspicious/Prohibited Purchasers**

No suspicious purchasers were identified.

## **8 – Trace Activity**

The Crime Gun Analysis Branch Firearm Trace History indicated the licensee had (b)(3)-11 traces during this inspection period. There was a large number of unresolved traces

# FIREARMS INSPECTION REPORT

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are due from the licensee purging their records that are over 20 years old. The licensee A & D Record and ATF Forms 4473 start from January 1990. All Traces from 1990 to the present were completed.

## 9 - NFA/Importer/Collector/Manufacturer

The licensee stated that he has not received or transferred any NFA Weapons. Investigator (b)(6) queried the National Firearms Registration and Transfer Record. There were no NFA weapons transferred to Martin B. Retting, Inc. (See Exhibit 1).

The licensee has not imported any firearms into the United States, during this inspection period. Investigator (b)(6) contacted the ATF Imported Branch and verified the Martin B. Retting has not imported any firearms during this inspection period (See Exhibit 2). The licensee indicated they would like to maintain the Importer's License so they can have the option to Import Firearms in the future.

The licensee does not have a collector license or a manufacturing license at this location.

## 10 - Referrals

No referral was generated from this inspection.

## 11 - Other

The licensee has the Youth Handgun Safety Act poster displayed at the business premise.

## 12 - Closing Actions

On September 9, 2015, Investigator (b)(6) conducted a closing conference with Robert Retting, Vice President and Daniel Retting, President.

On September 9, 2015, Investigator (b)(6) explained applicable laws, regulations, and record keeping requirements to Robert Retting, Vice President and Daniel Retting, President. Investigator Woods had Robert Retting sign and date the Acknowledgement of Federal Firearms Regulations (See Exhibit 3).

The licensee was cited seven violations. A Report of Violations was issued (See Exhibit 4). Investigator (b)(6) advised the licensee of the violations and the corrective action necessary to correction the records. During this inspection, the licensee corrected their A & D Record.

# FIREARMS INSPECTION REPORT

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**Trade Name:**

**UI#:** 784025-2014-0246-B1B  
**FFL#:** 9-95-037-08-24990

Investigator (b)(6) advised the licensee one of the violations cited on ATF Form 5030.5, Report of Violations, merits a Warning Letter.

## 13 - Violations

### 1. 27 CFR 478.125(e)

Violation:

Failed to timely enter the acquisition of (b)(7)(C) firearms and the disposition of (b)(7)(C) firearms into the A & D Record. Out of the (b)(7)(C) dispositions the licensee was unable to account for (b)(3) - 112 Public Law of the firearms.

Failed to accurately enter (b)(3) correct acquisition information (Serial Number) into the A & D Record.

Licensee's Response: The licensee acknowledges the violations and has corrected his A & D Record.

Corrective Action: Licensee will enter all (b)(7)(C) acquisitions and (b)(7)(C) dispositions into the A & D Records and will ensure all acquisitions and dispositions are timely entered into the A & D Record. The licensee will report the missing (b)(3) - 112 Public Law firearms to the local authorities and to ATF.

### 2. 27 CFR 478.126 a

Violation: Failed to report multiple sales or other dispositions of handguns on (b)(7)(C) transactions involving (b)(7)(C) handguns to ATF.

Licensee's Response: The licensee acknowledges the violation. The licensee indicated they complete ATF Forms 3310.4 for multiple sales, but this one was missed.

Corrective Action: The licensee will complete ATF Forms 3310.4 for the (b)(7)(C) multiple sales of handguns and will ensure ATF Forms 3310.4 are completed when two or more handguns are transferred to a nonlicensee within 5 consecutive business days.

### 3. 27 CFR 478.21(a)

Violations: Failed to follow the instructions on (b)(3) ATF Form 4473, pertaining to

# FIREARMS INSPECTION REPORT

**Name:** Martin B. Retting, Inc.  
**Trade Name:**

**UI#:** 784025-2014-0246-B1B  
**FFL#:** 9-95-037-08-24990

completing ATF Forms 4473.

Licensee's Response: The licensee acknowledges the violation and indicated that they will be checking their ATF Forms 4473 more closely to ensure ATF Forms 4473 are complete and accurate.

Corrective Action: The licensee will ensure that all ATF Forms 4473 are completed accurately per the instructions on the form, prior to transferring a firearm to a nonlicensee.

4. **27 CFR 478.124(c)(1)**

Violations: Failed to ensure the transferee completed ATF Forms 4473 Section A, prior to transferring a firearm to a nonlicensee.

Licensee's Response: The licensee acknowledges the violation and indicated that they will be checking their ATF Forms 4473 more closely to ensure ATF Forms 4473 are complete and accurate.

Corrective Action: The licensee will ensure the transferee completes ATF Forms 4473, prior to transferring a firearm to a nonlicensee.

5. **27 CFR 478.124(c)(3)(i)**

Violations: Failed to verify the identity of the transferee by examining the identification document and verifying the correct information is reflected on ATF Forms 4473.

Licensee's Response: The licensee acknowledges the violation and indicated that they will comply with ATF regulations and document the identification used to identify the transferee on ATF Forms 4473.

Corrective Action: The licensee will document the identification used to identify the transferee and the correct information including the name is reflected on ATF Forms 4473.

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

Violations: The transferor failed to sign and date ATF Form 4473, prior to

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**Name:** Martin B. Retting, Inc.  
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transferring a firearm to a nonlicensee.

Licensee's Response: The licensee acknowledges the violation and indicated that they will comply with ATF regulations and ensure the transferor signs and dates ATF Form 4473, prior to transferring a firearm to a nonlicensee.

Corrective Action: The licensee will ensure the transferor signs and dates ATF Forms 4473, prior to transferring a firearm to a nonlicensee.

## 27 CFR 478.99 (c)

Violation: [REDACTED] (b)(3) - 112 firearm was transferred to a transferee, when the licensee had reasonable cause to believe the transferee was prohibited, because the transferee answered "Yes" on ATF Form 4473 Section A #12. The transferee was not prohibited.

Licensee's Response: The licensee acknowledged the violation and indicated that he will contact the transferee and have the transferee correct ATF Forms 4473.

Corrective Action: Licensee will contact the transferee either by telephone or Certified Mail requesting the transferee comes to the business premise to correct ATF Forms 4473.

X

Industry Operations Investigator

## **Index of Worksheets and Exhibits**

Exhibit 1 - National Firearms Registration and Transfer Record

Exhibit 2 - Email from ATF Imported Branch

Exhibit 3 - Acknowledgement of Federal Firearms Regulations

Exhibit 4 - Report of Violations

# FIREARMS INSPECTION REPORT

**Name:** Martin B. Retting, Inc.  
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U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

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

September 16, 2015

Martin B. Retting, Inc.  
11029 W. Washington Blvd.  
Culver City, CA 90232

9-95-037-08-8C-24990

Dear Sir:

During a recent inspection at your firearms business covering the period May 2014 to May 2015 you were cited for violations of Title 27, Code of Federal Regulations, Part 478. A copy of the Report of Violations, ATF F 5030.S, issued at the time of the inspection is enclosed.

All violations were fully explained to you or your designated responsible person by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Industry Operations Investigator(s). You or your responsible person indicated that you understood the requirements of the firearms laws and regulations and that corrective actions would be taken to eliminate future violations.

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. This is critical to carrying out our mission to protect the public and to ensure that criminals do not gain access to firearms. ATF appreciates the efforts you and other industry members make in this area. We look forward to continuing to work with you in that regard.

You are reminded that retention of your Federal firearms license is conditioned upon your compliance with Federal laws and regulations. Any future violations, either repeat or otherwise, could be viewed as willful and may result in the revocation of your license. Please ensure that future compliance is achieved.

Should you have any questions regarding this matter, please contact (b)(6) (b)(6) Industry Operations Investigator at (b)(6)

Sincerely yours,

(b)(6)  
Area Supervisor