

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Starquest Shooters & Survival Supply Inc. Starquest Shooters & Survival Supply 1707 B Marsh Road Wilmington, DE 19810, New Castle	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 761025-2015-0188-B1B			
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">3. PERMIT/LICENSE NUMBER 851003017C00758</td> <td style="width: 33%;">4a. TARGET DATE 9/30/2015</td> <td style="width: 33%;">4b. TARGET HOURS 45</td> </tr> </table>	3. PERMIT/LICENSE NUMBER 851003017C00758	4a. TARGET DATE 9/30/2015	4b. TARGET HOURS 45
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5. REQUESTED BY (SIGNATURE, TITLE AND DATE)				

6. ATF OFFICER(S) ASSIGNED
(b)(6) - Lead Investigator

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
(b)(6) Area Supervisor, 05/12/2015

8. PURPOSE/SPECIAL INSTRUCTIONS
 Conduct compliance inspection. Licensee previously suffered a theft; during the inventory assistance provided by ATF, IOI **(b)(6)** discovered a large discrepancy between the number of firearms in inventory and open dispositions in the A&D record. Additionally, the licensee maintained records away from the business premises despite being instructed/ educated not to do so after IOI **(b)(6)** interaction with him.

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	5	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS	66	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: 09/25/2015

 Viols WL ONLY and No Recall Inspection

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
JUL 2015	19.50		
AUG 2015	69.50		
SEP 2015	77.00		
ATF OFFICER'S SUBTOTAL	166.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	166.00		

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION
 WL issued on 9-25-15.

 Viols WL ONLY and No Recall Inspection

REVIEWED
 CONCUR
 SEE COMMENTS
 FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6) - Area Supervisor	REVIEW DATE 09/22/2015
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13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Alternate Recommendation of Violations ONLY, Warning Letter and No Recall based on the following:

-This is the first compliance inspection conducted since issuance of the Federal firearms license (FFL) (b)(6) if the unreported Multiple Sales were handguns transferred to the only Responsible Person listed for this FFL; and the other four violations cited only warrant a Report of Violations. Further, the Lead IOI educated the licensee on regulatory requirements; and licensee has established internal controls to prevent repeat errors.

Viols WL ONLY and No Recall Inspection

REVIEWED
 CONCUR
 SEE COMMENTS
 FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6) - Acting DIO	REVIEW DATE 09/24/2015
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ROUTING SEQUENCE AND DATE

- 1. fflc 9-29-15
- 2. a/o file 9-29-15
- 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 Starquest Shooters & Survival Supply Inc.	Street Address 1707 B Marsh Road	City Wilmington	State DE	ZIP Code 19810	County New Castle	Page <u>1</u> of <u>3</u> Pages
License/Permit/Registry Number (if any) 8-51-003-01-7C-00758		Expiration Date 3/1/2017	Date(s) or Period of Inspection July 30, 2014 to July 30, 2015			

Inspection Results

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

Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Corrections to be Made (If not corrected immediately)
1	27 CFR 478.125(e)	<p>Failure of the licensee to record or properly record the acquisition of a firearm into the A&D record—^{(b)(3)} instances.</p> <ul style="list-style-type: none"> <input type="checkbox"/> On ^{(b)(3) 11} occasion the licensee failed to record the acquisition of a firearm. <input type="checkbox"/> On ^{(b)(3) 11} occasion the licensee recorded the acquisition of a firearm in error, duplicate entry. <input type="checkbox"/> On ^{(b)(3) 112} occasions the licensee failed to record the importer of a firearm. <input type="checkbox"/> On ^{(b)(3) 112 PL 55 125} occasions the licensee recorded an incorrect manufacturer of a firearm. <input type="checkbox"/> On ^{(b)(3) 112} occasions the licensee failed to record the manufacturer of a firearm. <input type="checkbox"/> On ^{(b)(3) 11} occasions the licensee recorded an incorrect importer of a firearm. <input type="checkbox"/> On ^{(b)(3) 11} occasion the licensee recorded an incorrect type of firearm. <input type="checkbox"/> On ^{(b)(3) 112} occasions the licensee recorded an incorrect serial number of a firearm. <input type="checkbox"/> On ^{(b)(3) 112 PL 5} occasions the licensee recorded an incorrect model of a firearm. <p>Failure of the licensee to record or properly record the disposition of a firearm in the A&D record—^{(b)(3)} instances.</p> <ul style="list-style-type: none"> <input type="checkbox"/> On ^{(b)(3) 11} occasion the licensee logged a firearm out of the A&D record in error, the firearm was not transferred and was still in inventory. <input type="checkbox"/> On ^{(b)(3) 112 PL 5} occasions the licensee failed to record the disposition of a firearm not later than seven (7) days following the date of such transaction. 	<p>Licensee was instructed by Investigator ^{(b)(3) 112 PL 55} to enter the correct / missing information into the A&D record. Licensee made corrections to the A&D record as instructed. Investigator ^{(b)(3) 112 PL} reminded the Licensee of the record keeping requirements of 27 CFR 478.125(e) and informed the Licensee of the firearm marking requirements of 27 CFR 478.92.</p>	Corrected Immediately

I Have Received a Copy of This Report of Violations (Proprietor's signature and title) <i>[Signature]</i> - President	Date 9/21/2015
Signature and Title of ATF Officer (b)(6) Senior I.C. Investigator	Date 9/21/2015

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Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken <i>(If not corrected immediately)</i>	Date Corrections to be Made <i>(If not corrected immediately)</i>
2	27 CFR 478.21a	On ^{(b)(3) 112} occasions the licensee failed to ensure that the information called for on each ATF F 4473 was furnished as indicated by the headings on the form and the instructions on or pertaining to the form. On ^{(b)(3) 112} occasion the transferee answered question 11.a. "no" when the answer should have been "yes". On ^{(b)(3) 112} occasion the transferee recorded an incorrect date for item #25.	Investigator ^{(b)(6)} reminded the licensee of the importance of properly recording all required information on the ATF F 4473.	Corrected Immediately
3	27 CFR 478.124(c)(1)	On ^{(b)(3) 112 F1} occasions the licensee failed to obtain a properly completed ATF F 4473 from the transferee prior to making an over-the-counter transfer of a firearm to a non-licensee including the following: <input type="checkbox"/> On ^{(b)(3) 112 F1} occasions the licensee failed to ensure that the transferee properly recorded his address in item #2. <input type="checkbox"/> On ^{(b)(3) 112 F1} occasion the licensee failed to ensure that the transferee properly recorded his place of birth in item #3. <input type="checkbox"/> On ^{(b)(3) 112 F1} occasion the licensee failed to ensure that the transferee answered no to question 11.b. The transferee answered yes. <input type="checkbox"/> On ^{(b)(3) 112 F1} occasion the licensee failed to ensure that the transferee answered no to question 11.i. The transferee answered yes. <input type="checkbox"/> On ^{(b)(3) 112 F1} occasion the licensee failed to ensure that the transferee answered no to question 11.l. The transferee answered yes.	Investigator ^{(b)(6)} reminded the licensee of the importance of receiving a properly completed ATF F 4473 from the transferee prior to conducting a NICS check or transferring a firearm.	Corrected Immediately
4	27 CFR 478.124(c)(3)(i)	On ^{(b)(3) 112} occasion the licensee failed to properly record the type of identification used by the transferee on the ATF F 4473 in item #20a.	Investigator ^{(b)(6)} reminded the licensee of the importance of properly recording all required information on the ATF F 4473.	Corrected Immediately

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Inspection Results

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

Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken <i>(If not corrected immediately)</i>	Date Corrections to be Made <i>(If not corrected immediately)</i>
5	27 CFR 478.126a	Failure of the licensee to report the multiple sale of pistols and revolvers no later than the close of business on the day the multiple sale occurred (b)(3) instances.	Investigator (b)(6) reminded the licensee of the requirements of 27 CFR 478.126a and instructed the licensee to fax the completed ATF F 3310.4 to the ATF Tracing Center for all unreported multiple sales.	Corrected Immediately

FIREARMS INSPECTION REPORT

Name: Starquest Shooters & Survival Supply Inc. **UI#:** 761025-2015-0188-B1B
Trade Name: Starquest Shooters & Survival Supply **FFL#:** 8-51-003-01-7C-00758

Address: Premises: 1707 B Marsh Road, Wilmington, DE 19810 (New Castle County)
Mailing: 2311 Graywood Road, Wilmington, DE 19810 (New Castle County)
Storage: 2007 Marsh Road, Wilmington, DE 19810 (New Castle County)

1 - Introduction

Inspection Profile:

A firearms licensee (dealer of firearms) compliance inspection was conducted by ATF Senior Industry Operations Investigator (b)(6) at the licensed premises of Starquest Shooters & Survival Supply Inc., dba Starquest Shooters & Survival Supply (FFL #8-51-003-01-7C-00758) located at 1707 B Marsh Road, Wilmington, DE 19810 (New Castle County). The inspection began on July 30, 2015 and was completed on September 21, 2015. No advance notice was given to the licensee. The inspection period was from July 30, 2014 to July 30, 2015. Interviewed during the course of the inspection was Mr. Ronald Charles Palimere Jr., Owner and Responsible Person, (b)(6), Salesman and (b)(6), Store Manager. Mr. Palimere provided a valid DE driver's license for identification.

During the course of the inspection Investigator (b)(6) was assisted by ATF Industry Operations Investigative Assistant (b)(6).

On Monday, September 21, 2015 Investigator (b)(6) held a closing conference with Mr. Palimere.

Business Profile:

Starquest Shooters & Survival Supply Inc. operates a retail firearms business located in a commercial building, in a suburban area of New Castle County, Delaware. The licensed premises are properly zoned by New Castle County for the retail sale of firearms. The original issue date of the FFL was on 2/4/2014. The business is open to the public. Hours of operation are Sunday 11am – 5pm, Monday – Friday 10am – 8pm and Saturday from 10am – 7pm. The licensee sells firearms, ammunition, shooting supplies and accessories. The licensee does not have enough space at the licensed premises for the storage of all firearms in inventory, therefore, the licensee utilizes offsite storage for surplus inventory. The licensee's offsite storage is located less than a mile from the licensed premises at 2007 Marsh Road, Wilmington, DE 19810. The offsite storage location is in a house the licensee rents for use as an office, classroom for firearms training and storing firearms. The licensee conducts business at gun shows and the licensee maintains a website to advertise the firearms business,

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www.starquestshootersurvivalsupply.com. The licensee also advertises on other firearms commerce websites such as www.gunsinternational.com.

During the inspection period the licensee acquired approximately (b)(4) firearms and disposed of approximately (b)(4) firearms (b)(4) handguns and (b)(4) % long guns and (b)(4) other / frames / receivers). Approximately (b)(4) % new firearms to (b)(4) % used. The following FFLs are (b)(4) primary suppliers of new firearms; (b)(4) .

In addition to the Federal Firearms License (FFL), Starquest Shooters & Survival Supply Inc. also possesses a State of Delaware Deadly Weapons Dealers License. The licensee does not possess any other ATF licenses. In addition to the retail firearms business the licensee also sells camping and survival supplies from the licensed premises.

Ownership and Control:

Starquest Shooters & Survival Supply Inc. is a corporation registered in the State of Delaware and is owned and operated by Mr. Ronald Charles Palimere Jr. Mr. Palimere stated that he is the 100% owner of the corporation. Mr. Palimere is correctly listed as the sole responsible person on the license in the ATF Federal Licensing System (FLS) database. There have been no changes in ownership or control since the license was issued. Hidden ownership is not suspected.

Although there have been no changes in ownership or control of the corporation since the license was issued, there is one change that needs to be made in the FLS database. On March 3, 2015, Mr. Ronald Charles Palimere Jr. filed a Certificate of Amendment of Certificate of Incorporation for Starquest Business Management, LTD. with the State of Delaware. The Certificate of Amendment was a name change of the corporation from Starquest Business Management, LTD. to Starquest Shooters & Survival Supply Inc. **See exhibit #20.** The FLS database needs to be updated to reflect the new name of the corporation, Starquest Shooters & Survival Supply Inc.

Variance:

None on file. None requested.

2 - Recommendation

Report of Violations Issued. Recommend Warning Letter be sent to licensee. No Recall Inspection.

FIREARMS INSPECTION REPORT

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Trade Name: Starquest Shooters & Survival Supply **FFL#:** 8-51-003-01-7C-00758

3 - Inspection History

Date and Type of Inspection: April 24, 2015 – FFL Theft Investigation / CE Assist
UI #: 761025-2015-0179-B1B & **CE UI #:** 761035-15-0082.

Inspection Results: The licensee identified (b)(3) firearms missing/stolen and reported such to the ATF National Tracing Center on ATF F 3310.11. See FFL Theft Number: (b)(3) 112 PL 55 125 STAT 552.

Cited Violations: No violations cited, however, a referral was made to the ATF Baltimore Field Division Area Supervisor requesting a compliance inspection be conducted due to a large discrepancy in the number of open dispositions (b)(3) in the A&D record and the actual number of firearms in inventory (b)(3) a difference of (b)(3) firearms. Also the licensee did not maintain the A&D records on the licensed premises, had not been making disposition entries in the A&D record since December 2014 and had no ATF F 4473 stored on premises to use to reconcile discrepancies in the A&D record. The licensee does not have a variance to maintain records off premises.

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

Starquest Shooters & Survival Supply Inc. maintains its Acquisition & Disposition records in bound form. The records were found to be kept at the licensed premises as required. All entries are hand written. Investigator (b)(6) reviewed the licensee's A&D records and found them to be kept in the proper format. At the time of inspection the licensee had five hundred one (501) firearms in inventory. At the same time, review of the A&D record disclosed five hundred twenty (b)(3) open entries. A difference of nineteen (b)(3) firearms. A full inventory was conducted by Investigator (b)(6) with the assistance of the owner, Mr. Ronald C. Palimere Jr., and ATF Industry Operations Investigative Assistant (b)(6). Each firearm in inventory was compared to the A&D record. For (b)(3) of the firearms in inventory a corresponding open entry in the A&D record was located. However, (b)(3) of these firearms (8.4%) were not correctly recorded in the A&D record. Also, for the (b)(3) firearms where no corresponding open entry could be located, (b)(3) of the firearms in inventory was not entered into the A&D record by the licensee and the other was entered but logged out in error. **See worksheet #1 and violation #1.** Additionally there were (b)(3) open entries where a firearm could not be located, (b)(3) of those open entries were firearms which were sold more than seven days prior to the inventory and (b)(3) of those open entries was a firearm that was entered in error (duplicate entry). **See worksheet #1 and violation #1.**

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Name: Starquest Shooters & Survival Supply Inc. **UI#:** 761025-2015-0188-B1B
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Mr. Palimere stated that prior to the burglary (4/24/2015), he tried to make all entries in the A&D record himself. He further stated that in addition to operating the firearms business he also operates Ron's Discount Tires, an automotive service center and tire and wheel dealer located at 1702 Naamans Road, Wilmington, DE. Mr. Palimere stated that he divides his time evenly between the two businesses. Mr. Palimere further stated that he (b)(6) in December 2014 and fell behind in logging firearms out of the A&D record. He also stated that he was maintaining the records (A&D Books and ATF F 4473) at the office / storage site, 2007 Marsh Road, Wilmington, DE 19810 (New Castle County), although he did not have a variance to do so. When Investigator (b)(6) responded to the licensee's premises to assist ATF Special Agents with the burglary investigation, Investigator (b)(6) addressed these issues with Mr. Palimere. Investigator (b)(6) advised that all records must be maintained on the license premises. When Mr. Palimere said he didn't have room for the records, because he had too much inventory, Investigator (b)(6) suggested Mr. Palimere move the excess inventory to the office / storage site in order to make room for the required records. Investigator (b)(6) also reminded Mr. Palimere of the time limitations for recording entries of acquisition & disposition in the records required per 27 CFR 478.125(e).

Mr. Palimere stated that since the burglary he did as advised by Investigator (b)(6) and moved the surplus firearms inventory to the storage site and brought all of the required records back to the licensed premises. Mr. Palimere also stated that he hired a part time book keeper to help keep the A&D records up to date. Mr. Palimere stated that it took a couple of months to bring the A&D records up to date. The current procedure is to record all transactions either on the day the transaction occurs or the next business day.

During the inspection period the licensee submitted one theft / loss report which resulted from a burglary on 4/24/2015, see UI #761025-2015-0179-B1B & CE UI #761035-15-0082. The licensee identified (b)(3) firearms missing/stolen and reported such to the ATF National Tracing Center on ATF F 3310.11. See FFL Theft Number: (b)(3) T12 PL 55 125 STA 1 552.

Investigator (b)(6) selected 25 firearms from the A&D records with dispositions recorded and found the corresponding ATF F 4473 on file documenting the disposition. No discrepancies were disclosed. In addition Investigator (b)(6) selected 25 ATF F 4473 and located the corresponding A&D records for each. Again no discrepancies were disclosed. Also, for each of the (b)(3) open entries where a firearm could not be located in inventory, Investigator (b)(6) had the licensee produce disposition documentation for each firearm prior to recording the disposition information in the A&D record. During the inspection no firearms were discovered with obliterated serial numbers nor were any illegal firearms discovered.

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5 - ATF Forms 4473 – NICS & Other Dispositions

The licensee had (b)(3) - 112 Public Law 55 125 Stat 552) ATF F 4473 on file for the inspection period. The ATF F 4473 were found to be at the licensed premises and were filed in chronological order. Investigator (b)(6) reviewed each of the (b)(3) - 112 Pub ATF F 4473 on file, which included 22 denied transactions. Investigator (b)(6) found that (b)(3) of the (b)(3) - 112 Pub forms (1.2%) contained errors. In addition there were (b)(3) forms on file that documented multiple handgun sales where the licensee failed to report the multiple sale no later than the close of business on the day the multiple sale occurred. See **Worksheet #2, exhibits # (b)(3) - 112 PL 55 and Violations #2 - #5.** The following discrepancies were disclosed:

- **27 CFR 478.21a** – On (b)(3) - 112 occasions the licensee failed to ensure that the information called for on each ATF F 4473 was furnished as indicated by the headings on the form and the instructions on or pertaining to the form. On (b)(3) - 112 occasion the transferee answered question 11.a. “no” when the answer should have been “yes”. On (b)(3) - 112 occasion the transferee recorded an incorrect date for item #25.
- **27 CFR 478.124(c)(1)** – On (b)(3) - 112 PL 55 occasions the licensee failed to obtain a properly completed ATF F 4473 from the transferee prior to making an over-the-counter transfer of a firearm to a non-licensee including the following:
 - On (b)(3) - 112 PL 55 occasions the licensee failed to ensure that the transferee properly recorded his address in item #2.
 - On (b)(3) - 112 occasion the licensee failed to ensure that the transferee properly recorded his place of birth in item #3.
 - On (b)(3) - 112 occasion the licensee failed to ensure that the transferee answered no to question 11.b. The transferee answered yes.
 - On (b)(3) - 112 occasion the licensee failed to ensure that the transferee answered no to question 11.i. The transferee answered yes.
 - On (b)(3) - 112 occasion the licensee failed to ensure that the transferee answered no to question 11.l. The transferee answered yes.
- **27 CFR 478.124(c)(3)(i)** – On (b)(3) - 112 occasion the licensee failed to properly record the type of identification used by the transferee on the ATF F 4473 in item #20a.
- **27 CFR 478.126a** – See section 6 of Narrative.

A FFL Audit Report for firearm transactions was requested through the Denial

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Enforcement and NICS Intelligence Branch for the time frame of 2/4/2014 through 7/28/2015. During this time period there were twenty five (25) denied transactions and in the last sixty days there were one hundred sixty (160) proceed responses, two (2) delayed transactions and two (2) open transactions. Investigator (b)(6) compared the National Instant Criminal Background Check System (NICS) numbers listed on the Audit Log to the NICS numbers recorded on the ATF Forms 4473. No discrepancies were disclosed.

During the inspection period the licensee conducted transfers of firearms to other licensee's. Prior to transferring any firearms to another licensee Mr. Palimere stated that he ensured that a certified copy of the recipient's FFL was received and he also utilized the ATF FFL EZ Check system before transferring any firearms to another licensee to verify the validity of such license. Investigator (b)(6) encouraged Mr. Palimere to print the FFL EZ Check response for filing with the certified copy of the FFL as proof that the license was valid at the time the firearm was transferred.

During the inspection period the licensee did not conduct any transfers to law enforcement.

During the inspection Investigator (b)(6) discussed the licensee's standard operating procedures relevant to the ATF Form 4473 completion with Mr. Palimere. Mr. Palimere stated that only he and his store manager (b)(3) 112 PL 55 125 STAT 552 (b)(6) are authorized to execute the ATF F 4473 on behalf of the licensee. Currently, no one reviews the forms for completeness or accuracy. Investigator (b)(6) encouraged the licensee to carefully review the forms for completeness and accuracy prior to transferring the firearm(s). Mr. Palimere stated that in the future he would ensure that two people look at the ATF F 4473 before any firearms are transferred and only those employees that have demonstrated an ability to successfully execute the forms under close supervision will be allowed to execute the forms on their own.

6 – Multiple Sales

On July 28, 2015 Investigator (b)(6) queried the ATF e-Trace database for all activity involving the licensee from the time period of 7/28/2014 to 7/28/2015. The query revealed 39 multiple sales involving 90 firearms.

While reviewing the ATF F 4473 (Firearms Transaction Record) and comparing them to the ATF F 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) and the ATF e-Trace database, it was discovered that the licensee had failed to report the multiple sale of pistols and revolvers no later than the close of business on the day the multiple sale occurred on (b)(3) occasions, involving (b)(3) firearms. See

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worksheet #2 and exhibits (b)(3) 112 PL 55 125 STAT 552 **and violation #5.** Investigator (b)(6) instructed the licensee to complete the ATF F 3310.4 for each of the unreported multiple sales and fax the forms to the ATF Tracing Center.

7 – Suspicious/Prohibited Purchasers

During the review of the licensee's Acquisition and Disposition Records and ATF F 4473s on file for the inspection period, Investigator (b)(6) did not identify any possible traffickers, straw purchasers or other suspicious purchasers. Investigator (b)(6) selected twenty three (23) firearm purchasers for criminal history queries which resulted in no hits where prohibiting criminal information was disclosed.

8 – Trace Activity

On July 28, 2015 Investigator (b)(6) queried the ATF e-Trace database for all activity involving the licensee from the time period of 7/28/2014 to 7/28/2015. The query revealed 0 successful traces and 0 unsuccessful traces.

Investigator (b)(6) selected 43 used firearms for query in the NCIC stolen gun database as well as the ATF e-Trace database which resulted with no hits. The licensee acquired approximately (b)(4) used firearms and disposed of approximately (b)(4) used firearms during the inspection period.

9 - NFA/Importer/Collector/Manufacturer

No NFA activity. Licensee is not an Importer, Collector or Manufacturer.

10 - Referrals

None.

11 - Other

Starquest Shooters & Survival Supply Inc. was found to be in compliance with both the Youth Handgun Act (poster and notice) and secure gun storage/safety devices.

12 - Closing Actions

On Thursday, September 17, 2015 ATF Senior Industry Operations Investigator Everett (b)(6) held a closing conference with Mr. Ronald C. Palimere Jr. During the closing a Report of Violations was issued to the licensee. Investigator (b)(6)

FIREARMS INSPECTION REPORT

Name: Starquest Shooters & Survival **UI#:** 761025-2015-0188-B1B
Supply Inc.
Trade Name: Starquest Shooters & Survival **FFL#:** 8-51-003-01-7C-00758
Supply

explained the violations to Mr. Palimere and discussed corrective measures to ensure that the violations are not repeated in the future. Mr. Palimere signed the Report of Violations acknowledging his receipt and a copy was provided to him. Also, during the closing Investigator (b)(6) reviewed the Federal Firearms Regulations with Mr. Palimere. The "Acknowledgement of Federal Firearms Regulations" was signed by Mr. Palimere and a copy was provided to him for his records. See exhibit #19. In addition, the licensee was provided with the following information:

- 1) ATF P 5300.4 "Federal Firearms Regulations Reference Guide" Revised September 2005. (Investigator (b)(6) advised the licensee about the availability of the 2014 edition and how to obtain a hard copy or electronic version.)
- 2) ATF P 5300.5 "State Laws and Published Ordinances – Firearms". (Investigator (b)(6) advised the licensee to obtain an electronic copy from the ATF website)
- 3) ATF P 5300.11 "Firearms Curios or Relics List".
- 4) ATF P 3317.2 "ATF National Tracing Center – Safety and Security Information for Federal Firearms Licensees".
- 5) ATF E-Form 5300.38 "Application for an Amended Federal Firearms License".
- 6) ATF I 5300.1 "Youth Handgun Safety Act Poster".
- 7) ATF I 5300.2 "Youth Handgun Safety Act Notice".
- 8) Copy of Open Letter to FFLs regarding "Child Safety Lock Act of 2005" dated 4/21/2006.
- 9) Copy of Open Letter to FFLs regarding transactions of Firearm "Frame(s)" or "Receiver(s)" dated 7/7/2009.
- 10) ATF P 3312.8 "Personal Firearms Record".
- 11) ATF F 4473 (5300.9) Revised April 2012 "Firearms Transaction Record Part I – Over-the-Counter".
- 12) ATF F 3310.4 "Report of Multiple Sale or Other Disposition of Pistols and Revolvers".
- 13) ATF F 3310.11 "Federal Firearms Licensee Firearms Inventory Theft/Loss Report".
- 14) ATF P 5300.15 "Federal firearms Licensee Information" and a copy of the "December 2002 Federal Firearms Licensee Newsletter" addressing the proper way to enter firearms into the Acquisition & Disposition Book.
- 15) ATF Ruling 2013-5 "Requirements to keep Firearms Acquisition and Disposition Records Electronically".
- 16) ATF I 5300.23A "Important Notice to Dealers and Other Participants at this Gun Show".
- 17) ATF P 5310.1 "Gun Free School Zone Notice".
- 18) ATF P 3312.10 "ATF National Tracing Center – Information for Industry Members".

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- 19) ATF P 3317.7 "ATF Disaster Preparedness for Federal Firearms Licensees".
- 20) ATF Ruling 2001-5 (Identification of Transferee)
- 21) Definition of "Antique Firearm" and list of weapons that load from the muzzle and remain classified as firearms, not antiques. Document obtained from ATF internet site, www.atf.gov.
- 22) Copy of Open Letter to all Federal Firearms Licensees, dated 1/16/2013, regarding private party transfers of firearms.
- 23) Copy of ATF Procedures 2013-1 regarding private party transfers of firearms.
- 24) ATF P 5300.21 "ATF Best Practices: Transfers of Firearms by Private Sellers"
- 25) Copy of Open Letter to all Federal Firearms Licenses, dated 5/5/2011, regarding record keeping requirements when there is a change to the response initially received by NICS during a background check for a firearm transfer pursuant to 18 U.S.C. 922(t).
- 26) ATF/Baltimore Field Division Phone List.

13 - Violations

1. 27 CFR 478.125(e)

Nature of violation:

Failure of the licensee to record or properly record the acquisition of a firearm into the A&D record—^{(b)(3)} instances.

- On ^{(b)(3) 112} occasion the licensee failed to record the acquisition of a firearm.
- On ^{(b)(3) 112} occasion the licensee recorded the acquisition of a firearm in error, duplicate entry.
- On ^{(b)(3) 112 F} occasions the licensee failed to record the importer of a firearm.
- On ^{(b)(3) 112 FL 55 128 STAT} occasions the licensee recorded an incorrect manufacturer of a firearm.
- On ^{(b)(3) 112 F} occasions the licensee failed to record the manufacturer of a firearm.
- On ^{(b)(3) 11} occasions the licensee recorded an incorrect importer of a firearm.
- On ^{(b)(3) 112} occasion the licensee recorded an incorrect type of firearm.
- On ^{(b)(3) 112 F} occasions the licensee recorded an incorrect serial number of a firearm.
- On ^{(b)(3) 112 FL 55} occasions the licensee recorded an incorrect model of a firearm.

Failure of the licensee to record or properly record the disposition of a firearm in the A&D record—^{(b)(3)} instances.

- On ^{(b)(3) 112} occasion the licensee logged a firearm out of the A&D record in error, the firearm was not transferred and was still in inventory.
- On ^{(b)(3) 112 FL 55} occasions the licensee failed to record the disposition of a firearm not later than seven (7) days following the date of such transaction.

FIREARMS INSPECTION REPORT

Name: Starquest Shooters & Survival Supply Inc. **UI#:** 761025-2015-0188-B1B
Trade Name: Starquest Shooters & Survival Supply **FFL#:** 8-51-003-01-7C-00758

Licensee's response:

Mr. Palimere stated that some of the errors occurred while training and transitioning to a part time book keeper to help with maintaining the A&D records. He also stated that he was unaware of the necessity to record the "manufacturer and importer (if any)" in the A&D record, and thought he could record one or the other. He also was unaware of the firearm marking requirements of 27 CFR 478.92.

Corrective action:

Licensee was instructed by Investigator (b)(6) to enter the correct / missing information into the A&D record. Licensee made corrections to the A&D record as instructed. Investigator (b)(6) reminded the Licensee of the record keeping requirements of 27 CFR 478.125(e) and informed the Licensee of the firearm marking requirements of 27 CFR 478.92.

Reference worksheet #1.

2. 27 CFR 478.21a

Nature of violation:

On (b)(3) occasions the licensee failed to ensure that the information called for on each ATF F 4473 was furnished as indicated by the headings on the form and the instructions on or pertaining to the form. (b)(3) 112 PL 55 125 STAT 552

Licensee's response:

Mr. Palimere stated that mistakes were made due to carelessness, not paying attention to detail while processing the forms.

Corrective action:

Investigator (b)(6) reminded the licensee of the importance of properly recording all required information on the ATF F 4473.

Reference worksheet #2 and exhibits # (b)(3) 112 PL 55 125

3. 27 CFR 478.124(c)(1)

Nature of violation:

On (b)(3) 112 PL 55 125 occasions the licensee failed to obtain a properly completed ATF F 4473

FIREARMS INSPECTION REPORT

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from the transferee prior to making an over-the-counter transfer of a firearm to a non-licensee including the following:

- On (b)(3) 112 PL 55 occasions the licensee failed to ensure that the transferee properly recorded his address in item #2.
- On (b)(3) 112 occasion the licensee failed to ensure that the transferee properly recorded his place of birth in item #3.
- On (b)(3) 112 occasion the licensee failed to ensure that the transferee answered no to question 11.b. The transferee answered yes.
- On (b)(3) 112 occasion the licensee failed to ensure that the transferee answered no to question 11.i. The transferee answered yes.
- On (b)(3) 112 occasion the licensee failed to ensure that the transferee answered no to question 11.l. The transferee answered yes.

Licensee's response:

Mr. Palimere stated that mistakes were made due to carelessness, not paying attention to detail while processing the forms.

Corrective action:

Investigator (b)(6) reminded the licensee of the importance of receiving a properly completed ATF F 4473 from the transferee prior to conducting a NICS check or transferring a firearm.

Reference worksheet #2 and exhibits # (b)(3) 112 PL 55 125 STAT 552

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

Nature of violation:

On (b)(3) 112 occasion the licensee failed to properly record the type of identification used by the transferee on the ATF F 4473 in item #20a.

Licensee's response:

Mr. Palimere stated that mistakes were made due to carelessness, not paying attention to detail while processing the forms.

Corrective action:

Investigator (b)(6) reminded the licensee of the importance of properly recording all required information on the ATF F 4473.

Reference worksheet #2 and exhibit (b)(3) 112

FIREARMS INSPECTION REPORT

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5. **27 CFR 478.126a**

Nature of violation:

Failure of the licensee to report the multiple sale of pistols and revolvers no later than the close of business on the day the multiple sale occurred – [REDACTED] instances.

Licensee's response:

Mr. Palimere provided no explanation as to how the multiple sales were missed.

Corrective action:

Investigator [REDACTED] reminded the licensee of the requirements of 27 CFR 478.126a and instructed the licensee to fax the completed ATF F 3310.4 to the ATF Tracing Center for all unreported multiple sales.

Reference worksheet #2 and exhibits # [REDACTED] (b)(3) 112 PL 55 125 STAT 552.

X

[REDACTED] (b)(6)
Senior Industry Operations Investigator

Index of Worksheets and Exhibits

- **Worksheet #1** – Inventory and A&D Review Worksheet.
- **Worksheet #2** – ATF F 4473 review worksheet.
- **Exhibits #1 - #18** – Copies of ATF F 4473 documented on worksheet #2 with copies of ATF F 3310.4 attached, where applicable.
- **Exhibit #19** – Acknowledgement of Federal Firearms Regulations.
- **Exhibit #20** – Copy of Certificate of Amendment of Certificate of Incorporation for Starquest Business Management, LTD., name change of the corporation to Starquest Shooters & Survival Supply Inc.



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Baltimore, MD 21201

www.atf.gov

September 25, 2015

761025 (b)(6)

Mr. Ronald Charles Palimere Jr.
Starquest Shooters & Survival Supply Inc.
dba – Starquest Shooters & Survival Supply
2311 Graywood Road
Wilmington, DE 19810

Re: FFL # 8-51-003-01-7C-00758

Dear Mr. Palimere:

During a recent compliance inspection at your firearms business covering the period of July 30, 2014, through July 30, 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.

All violations were fully explained to you by Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Senior Industry Operations Investigator (b)(6). You 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.

Starquest Shooters & Survival Supply Inc.
FFL # 8-51-003-01-7C-00758

You are reminded that retention of your Federal firearms license is conditional 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 Senior Industry Operations Investigator (b)(6).

Sincerely,

A large black rectangular redaction box covering the signature area, with the white text "(b)(6)" centered within it.

Area Supervisor
Baltimore Field Division

Enclosure: Report of Violations

cc: Federal Firearms Licensing Center
Baltimore V (IOI) Field Office