

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Hill Top Pawn, Inc. 1882 Athens Highway Snellville, GA 30078, Gwinnett	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 760530-2014-0060-B1B		
	3. PERMIT/LICENSE NUMBER 158135025B01520	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

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
(b) (6), Area Supervisor, 10/01/2013

8. PURPOSE/SPECIAL INSTRUCTIONS
The inspection should be conducted in accordance with the "Firearms Disposition Emphasis Inspection Quick Reference Guide."

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	10	NO. OF REFERRALS	3	2111 - PER DIEM	
NO. OF TECS CHECKS	59	NO. OF TECS HITS	1	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: 02/08/2017

Viols WC with WL and Recall

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b) (6)	
JUL 0	19.00		
ATF OFFICER'S SUBTOTAL	19.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b) (6)	
JUL 0	10.50		
AUG 0	18.50		
ATF OFFICER'S SUBTOTAL	29.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b) (6)	
JAN 0	2.00		
FEB 0	5.50		
JUN 0	2.50		
JUL 0	45.00		
AUG 0	95.50		
OCT 0	6.00		
NOV 0	1.00		
ATF OFFICER'S SUBTOTAL	157.50	ATF OFFICER'S SIGNATURE	

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	3. PERMIT/LICENSE NUMBER 158135025B01520	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)
JUL 0	9.00
ATF OFFICER'S SUBTOTAL	9.00
ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b) (6)
AUG 0	20.00
ATF OFFICER'S SUBTOTAL	20.00
ATF OFFICER'S SIGNATURE	
TOTAL HOURS	234.50

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

The investigation disclosed a total of (b) (6) violations. A total of (b) (6) violations warrant an administrative action for the following: Violation of 27 CFR 478.126a warrants a warning conference for failure to file multiple sales reports when legally required in (b) (6) or more instances, in this case (b) (6) instances; Violation of 27 CFR 478.99(c)(1) and 478.99(c)(9) warrants a warning letter for the transfer of a firearm in not more than (b) (6) instances to a person, who, although not actually prohibited at the time of transfer, appeared to be prohibited, in this case (b) (6) instances. However, the violation of 27 CFR 478.99(c)(1) warrants revocation for the transfer of a firearm to a prohibited person, knowing or having reason to believe that the transferee is a prohibited person in that the licensee permitted the transfer of a weapon on 4/8/14 after being notified by FBI NICs of the denied transfer on 4/3/14.

Viols DIO (or Delegate) Held WC ILO Revocation

☒ REVIEWED ☐ CONCUR ☒ SEE COMMENTS ☐ FINAL DISPOSITION

SIGNATURE AND TITLE (b) (6) - Director, Industry Operations	REVIEW DATE 10/06/2014
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REVIEW COMMENTS AND RECOMMENDATION

Concur with ALT-WC ILO Revocation. The investigation disclosed a total of (b) (6) violations. A total of (b) (6) violations warrant an administrative action for the following: Violation of 27 CFR 478.126a warrants a warning conference for failure to file multiple sales reports when legally required in (b) (6) or more instances, in this case (b) (6) instances; Violation of 27 CFR 478.99(c)(1) and 478.99(c)(9) warrants a warning letter for the transfer of a firearm in not more than (b) (6) instances to a person, who, although not actually prohibited at the time of transfer, appeared to be prohibited, in this case (b) (6) instances. However, the violation of 27 CFR 478.99(c)(1) warrants revocation for the transfer of a firearm to a prohibited person, knowing or having reason to believe that the transferee is a prohibited person in that the licensee permitted the transfer of a weapon on 4/8/14 after being notified by FBI NICs of the denied transfer on 4/3/14. Licensee stated that this was carelessness in the review of the form. Licensee stated that he was busy and answered the phone and yelled the response out across the room to the firearms counter. Licensee assumed that someone pulled the form and annotated it. Licensee promised future compliance. Licensee will ensure that the form is properly marked or the form will be brought to him for marking. The compliance inspection in the last five years does not disclose any violations.

Viols DIO (or Delegate) Held WC ILO Revocation

☒ REVIEWED ☐ CONCUR ☒ SEE COMMENTS ☒ FINAL DISPOSITION

SIGNATURE AND TITLE GJCOMPTON - Director of Industry Operations	REVIEW DATE 11/13/2014
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ROUTING SEQUENCE AND DATE

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

CONTROL FILE POSTED DATE _____

ROV CONTINUATION SHEET

478.124(c)(1)

(b)(3) - 112 Public Law 55 125 Stat 552, b6



478.124(c)(1) Continued:

(b)(3) - 112 Public Law 55 125 Stat 552, b6



478.124(C)(5)

(b)(3) - 112 Public Law 55 125 Stat 552, b6



FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

Address: 1882 Athens Highway
Snellville, GA 30078, Gwinnett

1 - Introduction

Inspection Profile:

Notification of the inspection to all Atlanta Field Division Criminal Enforcement Supervisors was provided on 6/20/2014 by A/S (b) (6) to determine if the inspection would compromise any ongoing investigation. The Criminal Enforcement Supervisors provided no response. Industry Operations Investigator (IOI) (b) (6) queried the Federal Licensing System (FLS) and N-force for Special Attention Flags (SAF) and on-going investigations respectively. The results of those queries were negative.

On July 28, 2014 through August 1, 2014, August 4, 2014, through August 6, 2014, and August 13, 2014, IOI (b) (6) conducted a Firearms Disposition Emphasis Inspection. The following IOIs assisted during the inspection period on the following dates:

IOI (b) (6) - July 28th and 29th
IOI (b) (6) - July 30th
IOI (b) (6) - August 1st and 5th
IOI (b) (6) - August 4th and 5th

Paul Slifko, Owner, was interviewed and available during the inspection. The inspection covered the period of July 27, 2013 to July 27, 2014. Advance notification was not provided. IOI (b) (6) held the Closing Conference on August 14, 2014.

Business Profile:

The licensee is a Type 02-Dealer, including pawnbroker in firearms other than destructive devices. The licensee buys and sells new and used firearms. The business also offers secured loans to people, with items of personal property used as collateral. The facility is a commercial storefront located in an urban area.

The licensee acquired approximately (b) (4) firearms during the inspection period. The firearms acquired consisted of (b) (4) hand guns, (b) (4) long guns, (b) (4) receivers, and (b) (4) silencers, which were (b) (4) used and (b) (4) new. The licensee disposed of approximately (b) (4) firearms ((b) (4) hand guns, (b) (4) long guns, and (b) (4) receivers) during the inspection period, which were (b) (4) retail and (b) (4) pawns.

FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

The licensee's primary suppliers are (b) (4), (b) (4). The licensee does not conduct sales at gun shows. The licensee utilizes gunbroker.com for internet sales. The licensee has their own website (www.hilltoppawn.net) also. There is no other business on the premises, or any other business conducted by the licensee. The licensee was in possession of the following certificates:

Special Occupational Tax Certificate control number (b)(3) - 26 USC 6103
Snellville Occupation Tax Certificate, expiration: 12/31/2014

The licensee has a Conditional Use Permit from the City of Snellville to operate a pawnshop. The licensee has held his ATF since 1/15/2003. There is no off-site storage of firearms.

Ownership and Control:

Hill Top Pawn, Inc is an active *domestic for profit* corporation registered with Georgia Secretary of State. The Secretary of State's listing shows Mr. Paul Slifko as the CEO, CFO, and Secretary. There have not been any unreported changes. There were no indicators of hidden ownership. FLS correctly shows Mr. Slifko as the only responsible person.

Variance:

The Licensee does not have any variances and none were requested during the inspection.

2 - Recommendation

Viols WC and Recall Inspection.

3 - Inspection History

Date and Type of Inspection:	November 17, 2010, Special Request Inspection-- Application for an Amended Federal Firearms License
UI#:	771030-2011-0076-B1B
Inspection Results:	Special Request completed. Amended Application Approved for change of address
Cited Violations:	None

FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

Date and Type of Inspection: March 23, 2009, Pawnbroker Random Sample
Follow-up Compliance
UI#: 771030-2009-0174-B1B
Inspection Results: No Viols, No Further Action, No Referrals
Cited Violations: None

Date and Type of Inspection: January 22, 2008, Pawnbroker Full Compliance
Inspection
UI#: 771030-2008-0174-B1B
Inspection Results: Viols, WL Only & No Recall
Cited Violations: 27 CFR 478.124(c)(1) – (b)(3) instances
27 CFR 478.126a – (b)(3) instances
27 CFR 478.124(c)(3)(ii) – (b)(3) instance

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

A full inventory was conducted. There were 1160 firearms in inventory and (b)(3) - 112 (b)(3) open entries in the A&D record. The licensee did not submit any theft or loss reports during the inspection period or as a result of this inspection. The A&D record was in the proper format and the entries were accurate and timely made. There were (b)(3) firearms traced through the licensee's required records from acquisition through disposition. No trafficking issues were identified. No obliterated serial numbers or illegal firearms were discovered. Upon receipt of firearms the licensee immediately records them into the A&D record, and when firearms are sold, redeemed, or transferred, the licensee immediately logs the firearms out of the A&D record.

5 - ATF Forms 4473 – NICS & Other Dispositions

The licensee had (b)(3) - 112 Public Law 55 125 Stat 552 ATF Forms 4473 on file for the inspection period. All the forms were reviewed. The licensee conducted all transfers to other licensees properly. The licensee did not have any sales to law enforcement; however, Mr. Slifko is aware of the proper procedures and documentation required for those transactions.

There were two suspicious purchasers (Referral # 2014-0026 and #2014-0027) and one possible prohibited person (Referral #2014-0025) identified during the inspection. The results of the FFL audit log was (247) denials, (129) proceeds, (1) delay, (3) open and (0) cancelled transactions. No discrepancies were discovered. The licensee stated that the ATF Forms 4473 are reviewed once by the clerk, who assisted the customer with the transaction, and reviewed again at the end of the day by the manager.

FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

IOI (b) (6) suggested to Mr. Slifko and his manager, (b) (6), to have a second review process before the transfer of the firearm and a third review at the end of the day or the next day before filing the ATF Form 4473 to help in alleviating errors.

The following ATF Forms 4473 violations were found and cited:

(1) Licensee failed to furnish the information called for on each form as indicated by the headings and instructions. Items 11a (Are you the actual buyer/transferee of firearm listed on form?), Item 24 and 25 (Transferee's Signature and Recertification Date), and Item 35 (Transferor's Title) contained errors or was blank.

(Ref: Report of Violations (ROV) – violation 1, Worksheet 2-4473(2012 Edition)(Exhibit 1).

(2) 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. Items 7, 11b through 11L, 13, 14, 16 and 17 contained errors.

(Ref: Report of Violations (ROV) – violation 2, Worksheet 2-4473(2012 Edition)(Exhibit 2).

(3) Licensee failed to verify the identity of the transferee by examining the identification document (as defined in Section 478.11) presented and note on the Form 4473 the type of identification used.

(Ref: Report of Violations (ROV) – violation 3, Worksheet 2-4473(2012 Edition)(Exhibit 3).

(4) Licensee failed to comply with the requirements 478.102 and record on the form the date on which the licensee contacted the NICS, as well as any response provided by the system, including any identification number provided by the system.

(Ref: Report of Violations (ROV) – violation 4, Worksheet 2-4473(2012 Edition)(Exhibit 4).

(5) Licensee failed to identify the firearm to be transferred by listing on the ATF Form 4473 the name of the manufacturer, importer (if any), the type, model, caliber or gauge, and the serial number of the firearm.

(Ref: Report of Violations (ROV) – violation 5, Worksheet 2-4473(2012 Edition)(Exhibit 5).

FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

(6) Licensee failed to sign (item 34) and date (item 36) or correctly date item 36 on the ATF Form 4473.

(Ref: Report of Violations (ROV) – violation 6, Worksheet 2-4473(2012 Edition)(Exhibit 6).

(7) 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 sales or other disposition occurred.

(Ref: Report of Violations (ROV) – violation 7, Worksheet 2-4473(2012 Edition)(Exhibit 7).

(8) Licensee failed to record permit or license information on the form when the permit/license was not attached. Item 23 error or expired date.

(Ref: Report of Violations (ROV) – violation 8, Worksheet 2-4473(2012 Edition)(Exhibit 8).

(9) Licensee transferred a firearm to a person having reasonable cause to believe that such person was prohibited.

(Ref: Report of Violations (ROV) – violation 9, Worksheet 2-4473(2012 Edition)(Exhibit 9).

(10) Licensee transferred a firearm to a person knowing or having reasonable cause to believe that such person was prohibited.

(Ref: Report of Violations (ROV) – violation 10, Worksheet 2-4473(2012 Edition)(Exhibit 10).

6 – Multiple Sales

The Violent Crime Analysis Branch (VCAB) FFL history was received for the period covering June 23, 2011 to June 24, 2014. The report revealed [REDACTED] multiple handgun transactions involving [REDACTED] firearms. There were [REDACTED] unreported multiple sales transactions involving [REDACTED] firearms. The licensee was cited for 27CFR 478.126a failure to report multiple sales or other disposition of pistols and revolvers not later than the close of business on the day that the multiple sales or other disposition occurred. The ATF Forms 3310.4 Report of Multiple Sales or Other Disposition of Pistols and Revolvers was completed, scanned, and emailed to the National Tracing Center on 8/14/14 and 8/16/2014 **(Exhibit 7).**

FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

7 - Suspicious/Prohibited Purchasers

There were no traffickers or straw purchasers identified during this inspection. Computerized criminal history checks were conducted on 26 transferees. There were two suspicious purchasers identified and one possible prohibited purchaser which were referred to Group VI, Intel.

(b)(3) - 112 Public Law 55 125 Stat 552, b6 (Ref: Report of Violations (ROV) – violation 9, Worksheet 2-4473(2012 Edition)(Exhibit 9))

(b)(3) - 112 Public Law 55 125 Stat 552, b6

8 - Trace Activity

The Violent Crime Analysis Branch FFL Master Query revealed (b)(3) firearm trace request in the last 12 months. There were a total of (b)(3) firearms queried in Open fox to include the 12 secondary market firearms. The secondary market firearms were queried through e-trace. None of the firearms were the subject of a firearm trace and were not reported as a stolen firearm.

9 - NFA/Importer/Collector/Manufacturer

The licensee is a registered National Firearms Act (NFA) firearms manufacturer and has (b)(3) - 26 USC 6103. The licensee had (b)(3) NFA firearms in physical inventory. IOI (b)(6) compared the firearms to the National Firearms Registration and Transfer Record (NFRTR) and the ATF Forms 3, Application for Tax-Exempt Transfer for each silencer and no discrepancies were found. The licensee does not conduct Importer, Collector, or Manufacturer activities.

10 - Referrals

Referral numbers 2014-0025, 2014-0026 and 2014-0027 were generated to Group VI, Intel during this inspection for (b)(3) possible suspicious purchasers and (b)(3) possible prohibited person.

11 - Other

No other significant findings were identified during the inspection. The licensee is in compliance with the Youth Handgun Safety Act and secure gun storage/safety device requirements.

FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

12 - Closing Actions

Investigator (b) (6) held a Closing Conference on August 14, 2014 with Mr. Paul Slifko, Owner and (b) (6), Manager to review and discuss the results of the inspection. The violations for which the licensee was cited were discussed, as well as corrective actions. Mr. Slifko signed and acknowledged the ATF F 5030.5, Report of Violations. The Acknowledgment of Federal Regulations was also reviewed with Mr. Slifko and (b) (6) who subsequently signed the Acknowledgement of Federal Firearms Regulations on August 14, 2014 (**Exhibit 11**).

IOI (b) (6) provided in depth training on the ATF Form 4473 on 8/14/2014. The following Hill Top Pawn personnel/employees were in attendance:

Paul Slifko, Owner (b) (6), Manager
(b) (6), Clerk (b) (6), Clerk

The following reference materials were provided:

- FFL Quick Reference Guide (ATF P 5300.15)
- Safety and Security Information (ATF P 3317.2)
- Important ATF Phone Numbers
- Open Letter to All Federal Firearms Licensees Jan 16, 2013 (transfers of firearms between private individuals)
- ATF Ruling 2013-5 Requirements to Keep Firearms Acquisition and Disposition Records Electronically
- ATF P 3312.8 Personal Firearms records
- ATF P 5300.11 Curios or Relics

13 - Violations

1. 27 CFR 478. 21(a)

Nature of Violation:

In (b)(3) - 112 Public Law 55 125 instances the licensee failed to furnish the information called for on each form as indicated by the headings and instructions:

Item 11a - Are you the actual buyer/transferee of firearm listed on form?

(b)(3) - 112 Public Law 55 125 Stat 552, b6

FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

(b)(3) - 112 Public Law 55 125 Stat 552, b6

(b)(3) - 112 Public Law 55 125 Stat 552, b6

Licensee's response:

"Careless review, no excuse everyone has been trained."

Corrective action:

Future Compliance. Licensee shall review Section A, B, C and D to ensure all items are correct and complete before transferring the firearm.

(Ref: Report of Violations (ROV) – violation 1, Worksheet 2-4473(2012 Edition)(Exhibit 1).

2. **27 CFR 478.124(c)(1)**

REPEAT OF VIOLATION CITED ON JANUARY 22, 2008

Nature of Violation:

In (b)(3) - 112 Public Law 55 125 Stat 552 instances the 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. Items 7, 11b through 11L, 13, 14, 16 and 17 contained errors.

(b)(3) - 112 Public Law 55 125 Stat 552, b6

FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

(b)(3) - 112 Public Law 55 125 Stat 552, b6



FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

(b)(3) - 112 Public Law 55 125 Stat 552, b6



Licensee's response:

"Careless review, no excuse everyone has been trained. We have implemented a second review process before the transfer of the firearm. A third review at the end of the day will be conducted and also a fourth review the next day before filing."

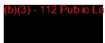
Corrective action:

Future Compliance. Licensee shall review Section A, B, C and D to ensure all items are correct and complete before transferring the firearm.

Ref: Report of Violations (ROV) – violation 2, Worksheet 2-4473(2012 Edition)(Exhibit 2).

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

Nature of Violation:

In  instances the licensee failed to verify the identity of the transferee by examining the identification document (as defined in Section 478.11) presented and note on the ATF Form 4473 the type of identification used.

(b)(3) - 112 Public Law 55 125 Stat 552, b6



FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

(b)(3) - 112 Public Law 55 125 Stat 552, b6

Licensee's response:

"We thought that you attach just the Driver's License to show what the old address was if it was not the same as current address listed on the form."

Corrective action:

Future Compliance. Licensee shall review Section A and verify the address on the identification document matches the address on the ATF Form 4473. If the address does not match, obtain an alternate government document to verify the address before completing Section B.

(Ref: Report of Violations (ROV) – violation 3, Worksheet 2-4473(2012 Edition)(Exhibit 3).

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

Nature of Violation:

In (b)(3) - 112 Public Law 55 125 Stat 552, b6 instances the licensee failed to comply with the requirements 478.102 and record on the form the date on which the licensee contacted the NICS, as well as any response provided by the system, including any identification number provided by the system.

Item 21d, If initial NICS or State response was "delayed," the following response was received from NICS or the appropriate State agency:

(b)(3) - 112 Public Law 55 125 Stat 552, b6

Item 21a, Date the transferee's identifying information was transmitted to NICS:

(b)(3) - 112 Public Law 55 125 Stat 552, b6

FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

(b)(3) - 112 Public Law 55 125 Stat 552, b6

Licensee's response:

"Carelessness, there is a big electronic calendar on the wall. I will make sure calendars are near all counters."

Corrective action:

Future Compliance. Licensee shall review Section B to ensure all items are correct and have been completed before completing Section D.

Ref: Report of Violations (ROV) – violation 4, Worksheet 2-4473(2012 Edition)(Exhibit 4).

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

Nature of Violation:

In (b)(3) - 112 Public Law instances the licensee failed to identify the firearm to be transferred by listing on the ATF Form 4473 the name of the manufacturer, importer (if any), the type, model, caliber or gauge, and the serial number of the firearm.

(b)(3) - 112 Public Law 55 125 Stat 552, b6

Licensee's response:

"Carelessness."

Corrective action:

Future Compliance. Licensee shall review Section D to ensure all items have been completed before transferring the firearm.

(Ref: Report of Violations (ROV) – violation 5, Worksheet 2-4473(2012 Edition)(Exhibit 5).

FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
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UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

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

Nature of Violation:

In (b)(3) - 112 Public Law 55 1 instances the licensees failed to sign (item 34) and date (item 36) or correctly date item 36 on the ATF Form 4473.

(b)(3) - 112 Public Law 55 125 Stat 552, b6



Licensee's response:

“Carelessness, I think the clerks are signing number 36 while calling into NICS and

FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

forgetting to date the form.”

Corrective action:

Future Compliance. Licensee shall review Section A, B, C, & D to ensure all items are correct and have been completed before transferring the firearm.

(Ref: Report of Violations (ROV) – violation 6, Worksheet 2-4473(2012 Edition)(Exhibit 6).

7. 27 CFR 478.126a

Nature of Violation:

In (b)(3) - 112 Public Law 55 125 Stat 552 instances 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 the following ATF Form 4473s:

(b)(3) - 112 Public Law 55 125 Stat 552, b6



FIREARMS INSPECTION REPORT

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FFL#: 1-58-135-02-5B-01520

Licensee's response:

"Carelessness."

Corrective action:

Complete ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers and forward to the ATF Tracing Center and to the local law enforcement agency (as prescribed on the form).

(Ref: Report of Violations (ROV) – violation 7, Worksheet 2-4473(2012 Edition)(Exhibit 7).

8. **27 CFR 478.131(a)(2)**

Nature of Violation:

In (b)(3) - 112 Public Law instances the licensee failed to record permit or license information on the form when the permit/license was not attached.

(b)(3) - 112 Public Law 55 125 Stat 552, b6

Licensee's response:

"Carelessness."

Corrective action:

Future Compliance. Licensee shall review Section B to ensure all items are accurate, valid, and complete before completing Section D.

Ref: Report of Violations (ROV) –violation 8, Worksheet 2-4473(2012 Edition)(Exhibit 8)

FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

9. 27 CFR 478.99(c)(1)

Nature of Violation:

In (b)(3) - 112 Public instances the licensee failed to record permit or license information on the form when the permit/license was not attached.

(b)(3) - 112 Public Law 55 125 Stat 552, b6

Licensee's response:

“Carelessness in the review of the form. “

In regards to (b)(3) - 112 Public Law 55 125 Stat 552, b6, “This has never happened before. I'm shocked that it was me. I must have been busy and answered the phone and yelled the response out across the room to firearms counter and assumed someone pulled the form and annotated it. I will make sure in the future to follow up to make sure the form is properly marked or bring the form to me for marking.”

Corrective action:

Future compliance. The licensee shall stop the transaction if answer is "yes" to item 11b through 11k. If initial NICS response was delayed and NICS calls back, immediately retrieve the ATF Form 4473 and record new NICSs response on 21d.

(Ref: Report of Violations (ROV) – violation 9, Worksheet 2-4473(2012 Edition)(Exhibit 9).

FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

10. 27 CFR 478.99(c)(9)

Nature of Violation:

In (b)(3) - 112 Pub L 55 instance the licensee transferred a firearm to a person knowing or having reasonable cause to believe that such person was prohibited.

(b)(3) - 112 Public Law 55 125 Stat 552, b6

Licensee's response:

“Carelessness in the review of the form. “

Corrective action: Future compliance. The licensee shall stop the transaction if answer is "yes" to item 11b through 11k.

(Ref: Report of Violations (ROV) – violation 10, Worksheet 2-4473(2012 Edition)(Exhibit 10).

FIREARMS INSPECTION REPORT

Name: Hill Top Pawn, Inc.
Trade Name:

UI#: 760530-2014-0060-B1B
FFL#: 1-58-135-02-5B-01520

(b) (6)	Industry Operations Investigator	11/7/2014
Signature	Title	Date of Report

Index of Worksheets and Exhibits

Worksheets

Worksheet 2 – 4473 (2012 Edition)

Exhibits

1. 27CFR 478.21(a) Violations
2. 27 CFR 478.124(c)(1) Violations
3. 27 CFR 478.124(c)(3)(i) Violations
4. 27 CFR 478.124(c)(3)(iv) Violations
5. 27 CFR 478.124(c)(4) Violations
6. 27 CFR 478.124(c)(5) Violations
7. 27 CFR 478.126a Violations
8. 27 CFR 478.131(a)(2) Violations
9. 27 CFR 478.99(c)(1) Violation
10. 27 CFR 478.99(c)(9) Violations
11. Acknowledgement of Federal Firearms Regulations

Mr. Paul Slifko
Hill Top Pawn, Inc.

Atlanta, Georgia 30345

771030 (b) (6)
5373

Mr. Paul Edward Slifko
Hill Top Pawn, Inc,
1882 Athens Highway

Snellville, Ga 30078

1-58-135-02-5B-01520

Dear Mr. Slifko:

During a compliance inspection at your firearms business, 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 Thursday, January 22, 2015 at 10:00 a.m. at the ATF Atlanta Field Division offices located 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.

Please contact 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,

Mr. Paul Slifko
Hill Top Pawn, Inc.

(b) (6)
Atlanta Group V Supervisor

Enclosure

cc: DIO, Atlanta Field Division
Federal Firearms Licensing Center

Atlanta, Georgia 30345

760530 (b) (6)
5373

Mr. Paul Slifko, Owner
Hill Top Pawn, Inc.
1882 Athens Highway
Snellville, Georgia 30078

1-58-135-02-5B-01520

Dear Mr. Slifko:

This letter is a follow-up to the warning conference held with you on January 21, 2015 at the Atlanta Field Division Office located at 2600 Century Parkway, Atlanta, Georgia 30345. During this conference, the violations cited during the inspection covering the period July 27, 2013 to July 27, 2014, and the necessary corrective action to prevent the violations from recurring were discussed.

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

Regarding Violations # 1, 2, 5, 6 & 8 where you failed to obtain the information required as indicated by the headings on the form and the instructions on or pertaining to the ATF Forms 4473. You stated that the sales associate is encouraged to walk the customer through the completion of the ATF Form 4473 to ensure the forms are completed properly. You stated that the ATF Forms 4473 will be reviewed twice before the final transfer of a gun, and two more times after the weapon has been transferred. Specifically, a sales person will review the form after the form has been completed by the purchaser, a sales clerk will review the form before the purchaser leaves the store, a sales person will conduct a review of the forms at the end of the day, and the following morning, a sales clerk will conduct a final review of the forms completed the previous day, and will file the forms away.

Regarding Violation # 3 where you failed to verify the identity of the transferee by examining the identification document presented, and record on the ATF Form 4473 the type of identification used. You stated that you will obtain an additional alternate documentation to

verify the current address of the customer, and will record the type of identification on the ATF Form 4473.

Regarding Violation # 4 where you failed to comply with the requirements of 27 CFR 478.102 to record on the ATF Form 4473 the date on which the licensee contacted NICS, as well as any response provided by the system. You stated that when NICS is contacted, the sales clerk will record the date of the initial contact on the ATF Form 4473, the same day of the phone call. You also stated that you are currently conducting NICS checks online so that you can have a printout of NICS' response and use it to accurately record NICS information on the ATF Forms 4473. Additionally, you stated that you maintain a "Delayed File" for the forms, and will update the forms when a call is received from NICS or when no resolution is made at all.

Regarding Violation # 7 where you 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 an ATF Form 3310.4 Multiple Sale Transaction Form. You stated that Multiple Sales Reports are being faxed to ATF when multiple transactions occur, and that you will mail a copy of the reports to ATF at the end of the month.

Regarding Violation # 9 & 10 where you failed to prevent the transfer of a firearm to a person knowing or having reasonable cause to believe that such person is in one of the prohibited categories of persons. You stated that the sales clerk will prevent the sale to a customer when a yes question is provided in the prohibiting section of the ATF Form 4473. Additionally, you stated that you are maintaining a "Delayed File," and when a call is received from NICS, the sales clerk receiving the call will immediately retrieve the ATF Form 4473 from the delayed file, and will record the response on the form.

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,

(b) (6)

Director, Industry Operations

cc: Area Supervisor, Atlanta Field Division, Group V
Federal Firearms Licensing Center