

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) ACE JEWELRY & LOAN, INC. 4750 E. BELKNAP FORT WORTH, TX 76117, TARRANT	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 781080-2015-0054-B1B		
	3. PERMIT/LICENSE NUMBER 575439027D05743	4a. TARGET DATE 9/15/2015	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

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
Sherry T. Perales, Area Supervisor, 10/01/2014

8. PURPOSE/SPECIAL INSTRUCTIONS
SWBI - RECALL LAST INSPECTION WAS ALTERNATE FROM REVOC. TO DIO HELD WC - 7/10/14

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	11	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS	55	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) Senior IO Investigator
Submitted on: 12/15/2015

Viols and Revocation / Denial of Renewal App

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
JUN 2015	8.00		
ATF OFFICER'S SUBTOTAL	8.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
JUN 2015	7.00		
ATF OFFICER'S SUBTOTAL	7.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
MAY 2015	2.00		
JUN 2015	49.00		
JUL 2015	26.00		
FEB 2016	2.00		
ATF OFFICER'S SUBTOTAL	79.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	94.00		

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	3. PERMIT/LICENSE NUMBER 575439027D05743	4a. TARGET DATE 9/15/2015	4b. TARGET HOURS
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13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Viols and Revocation / Denial of Renewal App

☒ REVIEWED ☒ CONCUR ☐ SEE COMMENTS ☐ FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6) Area Supervisor	REVIEW DATE 09/21/2015
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REVIEW COMMENTS AND RECOMMENDATION

Viols and Revocation / Denial of Renewal App

☒ REVIEWED ☒ CONCUR ☒ SEE COMMENTS ☒ FINAL DISPOSITION

SIGNATURE AND TITLE KRMURPHY - Director, Industry Operations	REVIEW DATE 11/24/2015
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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 ACE JEWELRY & LOAN, INC.	Street Address 4750 E. BELKNAP	City FORT WORTH	State TX	Zip Code 76117-	County TARRANT	Page 1 of 7 Pages
License/Permit/Registry Number (If any) 575439027D05743		Expiration Date 4/1/2017		Date(s) or Period of Inspection 06/17/2015 through 06/30/2015		

Inspection Results

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

Number: 1

Date Corrections to be Made: 06/17/2015

(If not corrected immediately)

Nature of Violation:

The licensee failed to record the acquisition and/or disposition of a firearm in the record in instances. (b)(3) (112 Public Law 55 125 Stat 552)

Corrective Action to be Taken: The record was corrected during the inspection.

(If not corrected immediately)

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

Citation: 27 CFR 478.125(e)

Number: 2

Date Corrections to be Made:

(If not corrected immediately)

Nature of Violation:

The licensee failed to record the transferor's name and title on the ATF Form 4473 in instances. (b)(3) (112 Public Law 55 125 Stat 552); (b)(6)

Corrective Action to be Taken: Preventative action discussed. The licensee was advised to review all ATF Forms 4473 prior to filing for completeness and accuracy.

(If not corrected immediately)

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

Citation: 27 CFR 478.21(a)

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License/Permit/Registry Number <i>(If any)</i> 575439027D05743	Expiration Date 4/1/2017	Date(s) or Period of Inspection 06/17/2015 through 06/30/2015				

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:

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

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

Preventative action was discussed. The licensee was advised to review all of the forms before the transaction is complete and the forms are filed.

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

Citation: 27 CFR 478.124(c)(1)

Report of Violations

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License/Permit/Registry Number <i>(If any)</i> 575439027D05743		Expiration Date 4/1/2017		Date(s) or Period of Inspection 06/17/2015 through 06/30/2015		

Inspection Results

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

Number: 4

Nature of Violation:

The licensee failed to record the correct expiration date of the identification document used to identify the transferee in _____ instances. **(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)**

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

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Preventative action was discussed. Mr. Davis was advised to review all of the forms before the transaction was complete and the forms are filed.

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

Report of Violations

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License/Permit/Registry Number (If any) 575439027D05743		Expiration Date 4/1/2017		Date(s) or Period of Inspection 06/17/2015 through 06/30/2015		

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:

The licensee recorded the transferee's date of birth instead of the date NICS was contacted in Section 21a of the ATF Form 4473 in [redacted] instances. These included transactions to

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

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

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Preventative action was discussed. Mr. Davis was advised to review all of the forms before the transaction was complete and the forms are filed.

Number: 6

Nature of Violation:

The licensee failed to record the serial number of the firearms transferred on the ATF Forms 4473 in [redacted] instances. **(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)**

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

Citation: 27 CFR 478.124(c)(4)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Preventative action was discussed. Mr. Davis was advised to review all of the forms himself or have **(b)(6)** review the forms on a regular basis.

Report of Violations

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License/Permit/Registry Number (If any) 575439027D05743		Expiration Date 4/1/2017	Date(s) or Period of Inspection 06/17/2015 through 06/30/2015			

Inspection Results

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

Number: 7

Nature of Violation:

The licensee failed to sign and date the ATF Form 4473 in instances. The information

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

Citation: 27 CFR 478.124(c)(5)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Preventative action was discussed. Richard Davis was advised to review all of the forms himself or make sure **(b)(6)** reviews the forms on a regular basis.

Number: 8

Nature of Violation:

The licensee failed to record the issuing State and Permit type of document used in lieu of NICS in instance on the ATF Form 4473. **(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)**

Citation: 27 CFR 478.131(a)(2)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Preventative action was discussed. Mr. Davis was advised to review all of the forms himself or make sure **(b)(6)** reviews the forms on a regular basis.

Report of Violations

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License/Permit/Registry Number <i>(If any)</i> 575439027D05743		Expiration Date 4/1/2017	Date(s) or Period of Inspection 06/17/2015 through 06/30/2015			

Inspection Results

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

Number: 9

Date Corrections to be Made: 06/17/2015
(If not corrected immediately)

Nature of Violation:

Corrective Action to be Taken: The NICS Denied transaction forms were filed separately
(If not corrected immediately) during the inspection period.

The licensee failed to separately file NICS denied transactions from completed ATF Form 4473 transactions in _____ instances. **(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)**

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

Citation: 27 CFR 478.129(b)

Number: 10

Date Corrections to be Made: 06/18/2015
(If not corrected immediately)

Nature of Violation:

Corrective Action to be Taken: The firearm was returned to the pawn shop on June 18, 2015. It was verified in inventory during the closing conference on June 30, 2015.

The licensee failed to have a transferee complete an ATF Form 4473 in _____ instance. A

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

Citation: 27 CFR 478.124(a)

Report of Violations

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License/Permit/Registry Number <i>(If any)</i> 575439027D05743	Expiration Date 4/1/2017	Date(s) or Period of Inspection 06/17/2015 through 06/30/2015				

Inspection Results

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

Number: 11

Nature of Violation:

The licensee delivered (b)(3) (112 Public Law 55 125 Stat 552), (b)(6)
(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)

Citation: 27 CFR 478.102(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The firearm was returned to the licensee on June 18, 2015 and is currently in inventory.

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

Date

Signature and Title of ATF Officer

Date

Report of Violations

Instructions

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Name of Proprietor	Street Address	City	State	ZIP Code	County	Page _____ of _____ Pages
License/Permit/Registry Number (if any)		Expiration Date	Date(s) or Period of Inspection			

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)
112710				

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

Signature and Title of Agent

(b)(6)

FOI

Copy 1 - Proprietor's Copy

Date 6/30/15
Date 6/30/15
ATF E-Form 5030.5
Revised April 2005

FIREARMS INSPECTION REPORT

Name: Ace Jewelry & Loan Inc.
Trade Name:

UI#: 781080-2015-0054
FFL#: 5-75-439-02-7D-05743

Address: 4750 East Belknap
Fort Worth, TX 76117 Tarrant County

1 - Introduction

Inspection Profile:

On June 18, 2015, Industry Operations Investigator (IOI) (b)(6) commenced an unannounced Southwest Border Initiative (SWBI) compliance inspection at the licensed premises of Federal Firearms Licensee Ace Jewelry & Loan Inc. IOI (b)(6) met with and interviewed Nancy Davis, Secretary, Richard Davis, President, and Kyle Davis, Clerk of Ace.

The inspection period established was from 4/2014 through 4/2015.

This inspection was generated as a result of a DIO led Warning Conference that was held on June 10, 2014.

Business Profile:

The licensee operates as a pawn shop storefront in the State of Texas. The licensee has their Texas Pawn & Lending License current and displayed. Ace Jewelry & Loan, Inc. (Ace) buys and sells new guns primarily and takes guns in on loan for cash and credit. The unredeemed pawned firearms may be offered for sale. The current licensed entity has held this current ATF license since August of 2010. The owner and President of the corporation, Richard Davis, and/or the corporation itself has held previous ATF licenses for over 30 years. Per FLS, those licenses are currently "inactive". This licensee also sells new and used general merchandise including jewelry, clothing, appliances, tools, and media software. In the past 12 months of business operations, the licensee has acquired (b)(4) firearms and disposed of (b)(4) firearms. Other than a few new guns acquired from Colt, the majority of firearms acquired were from individuals. The majority of dispositions were to individuals and there were few dispositions to other dealers, manufacturers, or law enforcement officers during the inspection period. The licensee utilizes the web-site GunBroker.Com for some internet sales. The does not have their own web site. This licensee does not deal at gun shows and does not maintain any off-site storage.

The licensed premises are owned by Ace Jewelry & Loan, Inc. and are located in a commercially zoned area in Fort Worth, Texas. Their Texas Sales and Use Tax Permit is current. The licensee is not in violation of any local or State zoning ordinances.

FIREARMS INSPECTION REPORT

Name: Ace Jewelry & Loan Inc.
Trade Name:

UI#: 781080-2015-0054
FFL#: 5-75-439-02-7D-05743

Ownership and Control:

The licensee conducts business as a corporation in the State of Texas. The corporation was filed with the State in 1987 with a tax ID of (b)(3)(26 USC § 6103) (attached). Richard L. Davis, President, and his wife, Nancy L. Davis, Secretary/Vice President, are the only officers in the corporation. They each hold a 50% interest in the corporation (attached). They are correctly listed in FLS as responsible persons with their appropriate titles listed (attached). Texas Secretary of State (SOS) inquiries however disclosed that the corporation forfeited its existence on February 20, 2015, due to non-payment of franchise tax. The corporation charter/certificate was forfeited and the entity placed in a non-existence status, with the entity losing its right to conduct business in Texas as such entity (attached).

On June 30, 2015, responsible person Nancy Davis provided confirmation that the corporation has been reinstated and current until 2016 (Exhibit-1).

Queries in NFORCE did not disclose any open or closed cases associated with the licensee, Richard or Nancy Davis, or the licensed premises.

Variance:

The licensee does not possess nor have they requested any variances.

2 - Recommendation

Violations / Revocation of License.

The licensee has had adverse actions under this current FFL three times in the past 5 years. The licensee was subject to a DIO Led Warning Conference in 2014 which saw five violations cited. This current recall investigation saw an increase where 11 violations were cited in which 8 violations were repeat violations from previous inspections. The licensee did not institute any of the procedures (inventories, double checks on records) that he spoke of during the June 2014 warning conference.

3 - Inspection History

The licensee three most current compliance investigations resulted in two warning conferences and one DIO Led Warning Conference. As stated previously, the licensee also possessed a Type 01 (now inactive) which had inspections with violations in the years 2009, 2000, 1999, 1986 & 1978.

Date and Type of Inspection: April 23, 2014 / SWBI Compliance Investigation
UI#: 781110-2014-0134
Inspection Results: DIO Led Warning Conference

FIREARMS INSPECTION REPORT

Name: Ace Jewelry & Loan Inc.
Trade Name:

UI#: 781080-2015-0054
FFL#: 5-75-439-02-7D-05743

Cited Violations:

1. 27 CFR 478.21a – Repeat Violation
2. 27 CFR 478.124(c)(1) – Repeat Violation
3. 27 CFR 478.124(c)(3)(i) – Repeat Violation
4. 27 CFR 478.124(c)(5)– Repeat Violation
5. 27 CFR 478.125e – Repeat Violation

Date and Type of Inspection: February 29, 2012 / Firearms Compliance Recall

UI#: 781110-2012-0166

Inspection Results: Warning Letter & Recall

Cited Violations:

1. 27 CFR 478.21(a)
2. 27 CFR 478.124(b)
3. 27 CFR 478.124(c)(1)
4. 27 CFR 478.124(c)(3)(i)
5. 27 CFR 478.124(c)(3)(iv)
6. 27 CFR 478.124(c)(4)
7. 27 CFR 478.124(c)(5)-Repeat Violation
8. 27 CFR 478.125(e)
9. 27 CFR 478.129(b)
10. 27 CFR 478.126a
11. 27 CFR 478.129(c)

Date and Type of Inspection: September 27, 2010 / Firearms Compliance

UI#: 781110-2010-0553

Inspection Results: Warning Conference

Cited Violations:

1. 27 CFR 478.125e – Repeat Violation
2. 27 CFR 478.103

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

This licensee utilizes a computerized acquisition and disposition (A&D) record. The record contained all of the information required by 27 CFR 478.125(e). The licensee also includes an “Inventory” number, “Pawn” number (if in pawn), and a “Gun Reference” number (Exhibit-2).

According to the licensee’s computerized gun inventory record, there were 81 guns in inventory. These included 50 guns for sale, 28 guns in pawn, and three (3) guns in lay-a-way. (81 total) (Exhibit-3) Each firearm in the store was compared to the gun serial number, model number, gun reference number, and gun inventory number on the record. A total of 80 firearms were counted in the physical inventory. The following discrepancies were cited with the reconciliation of the violations explained:

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

FIREARMS INSPECTION REPORT

Name: Ace Jewelry & Loan Inc.
Trade Name:

UI#: 781080-2015-0054
FFL#: 5-75-439-02-7D-05743

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

The licensee was cited for violations of 27 CFR 478.125(e). There were no dispositions to law enforcement personnel. The licensee had [REDACTED] transfers to other licensees that were properly recorded. No thefts or losses were reported during the inspection period. There were no illegal firearms in the inventory. A total of 30 firearms were traced from acquisition to dispositions on ATF Forms 4473. The transactions sampled were properly recorded in the record.

5 - ATF Forms 4473 – NICS & Other Dispositions

This licensee had [REDACTED] ATF Forms 4473 on file for the inspection period of 12 months. All of the forms were examined. Several incomplete or incorrect entries were noted during a review of the forms. There were several instances where the transferor recorded the date of birth of the transferee instead of the expiration date of the document used to identify the transferee. There were several instances where the transferee failed to record any ID or any expiration date, failed to record complete gun information, or failed to sign and date forms. In [REDACTED] instance, a firearm was picked up for the purpose of repair by a non-licensee and no ATF Form 4473 was completed. There were several forms associated with “Denied” NICS responses that were filed with completed, approved transactions. The violations are documented in Section-13 of this report. Copies of the associated ATF Forms 4473 are included in [REDACTED]

A NICS FFL Audit Report was obtained prior to this inspection. (attached) There were 13 “Denied” transactions and 14 “Proceed” transactions on the report. All of the “Proceed” transactions and the “Denied” transactions from the inspection period were compared to the ATF Forms 4473 on file. No discrepancies were noted.

6 – Multiple Sales

A Firearm Trace History was obtained from the ATF Violent Crime Analysis Branch (VCAB) prior to this inspection. The query did not disclose any multiple sales during the inspection period and there were no multiple sales reported or made after April of 2014 by the licensee. In the preceding three years most multiple sales were dispositions the licensee, Richard Davis made to his personal collection. A review of the licensee’s records did not disclose any unreported multiple sale transactions

FIREARMS INSPECTION REPORT

Name: Ace Jewelry & Loan Inc.
Trade Name:

UI#: 781080-2015-0054
FFL#: 5-75-439-02-7D-05743

7 – Suspicious/Prohibited Purchasers

A review of the licensee's records to include ATF Forms 4473 on file did not disclose any possible traffickers, suspicious persons, underage purchasers, or possible straw transactions. A review of the disposition records and ATF Forms 4473 on file did not disclose any similar names or addresses as those persons associated with NICS "Denied" transactions. Most of the firearms associated with those transactions were still in inventory.

Further background queries were conducted on 20 individuals associated with incomplete or incorrect ATF Form 4473 transactions. No prohibited persons were disclosed.

8 – Trace Activity

The VCAB query disclosed that the licensee was not associated with any traces for the inspection period.

CCH queries were conducted on [redacted] firearms associated with incomplete or incorrect ATF Forms 4473s and firearms Richard Davis transferred to his personal collection. There were no traces or stolen firearms reported on these firearms researched.

9 - NFA/Importer/Collector/Manufacturer

This licensee has not acquired or disposed of any NFA weapons and no NFA weapons are registered to ACE or Richard and Nancy Davis. The licensee does not hold an NFA Special Tax Stamp. The licensee does not engage in business as an importer or manufacturer of firearms. The licensee does not engage in business as a Collector of Curios and Relics.

10 - Referrals

There were no referrals generated as a result of this inspection

11 - Other

The majority of the firearm transactions, both acquisitions and dispositions, are recorded by [redacted] (b)(6) Richard and Nancy Davis. [redacted] (b)(6) is not listed as a responsible person. [redacted] (b)(6) a responsible person that formerly worked at the pawn shop and handled the record-keeping, no longer works at the store. During the Warning Conference held with Richard Davis on July 10, 2014, the licensee stated that [redacted] (b)(6) was being trained to do all of the gun sales, review the ATF Forms 4473, make entries in the record, and check forms and entries for accuracy. (file) The licensee also stated that firearms received in the store would be

FIREARMS INSPECTION REPORT

Name: Ace Jewelry & Loan Inc.
Trade Name:

UI#: 781080-2015-0054
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immediately entered into the inventory and assigned an inventory number. The licensee also stated that timely inventories would be conducted and records checked weekly for accuracy. (Exhibit-5) This inspection disclosed no evidence of weekly inventories being taken, or multiple persons reviewing the paperwork or acquisition and disposition entries. Richard Davis stated that (b)(6) works at the pawn shop six (6) days a week and conducts most of the transactions. Neither Richard nor Nancy Davis review the records. Through discussions with the licensee and these inspection findings it appears that there are no standard operating procedures that are being met as few inventories, reconciliations, or reviews are being conducted.

12 - Closing Actions

The closing conference was held with Richard and Nancy Davis on June 30, 2015. All violations cited as a result of this inspection were reviewed and explained. Mr. Davis signed the Report of Violations, ATF Form 5030.5, and was provided with a copy. After a review of the violations, and a review of required ATF record-keeping regulations, he signed the Acknowledgement of Federal Firearms Regulations during the closing conference (Exhibit 9).

13 - Violations

1. **27 CFR 478.125(e)-REPEAT OF VIOLATION CITED April 25, 2014 & February 29, 2012**

Nature of Violation:

The licensee failed to record the acquisition and/or disposition of a firearm in the record in (b)(3) (112 Public Law 55 125 Stat 552) instances.

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

Licensee's Response:

The Glock pistol was picked up by an individual, (b)(6) for the purpose of removing paint from the gun. The licensee thought that the Pietta revolver was a black powder weapon and it was not included in the regular firearm inventory.

Corrective Action:

The record was corrected during the inspection.
(Worksheet-1) (Exhibit-4)

2. **27 CFR 478.21a-REPEAT OF VIOLATION CITED April 25, 2014 & February 29, 2012**

Nature of Violation:

The licensee failed to record the transferor's name and title in (b)(3) (112 Public Law 55 125 Stat 552), (b)(6) instances. The information was not recorded.

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

FIREARMS INSPECTION REPORT

Name: Ace Jewelry & Loan Inc.
Trade Name:

UI#: 781080-2015-0054
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Licensee's Response:

Richard Davis stated that he thought **(b)(6)** was checking the forms to make sure they were complete.

Corrective Action:

Preventative action was discussed. Mr. Davis was advised to review all ATF Forms 4473 prior to filing for completeness and accuracy.

3. **27 CFR 478.124(c)(1)-REPEAT OF VIOLATION CITED April 25, 2014 & February 29, 2012**

Nature of Violation:

The licensee failed to ensure **(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)**

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

Licensee's Response:

Richard Davis stated that he believed **(b)(6)** was checking all of the forms for accuracy and completeness.

Corrective Action:

Preventative action was discussed. Richard Davis was advised to review all of the forms before the transaction is complete and the forms are filed. (Worksheet-2) (Exhibits 6 & 7)

4. **27 CFR 478.124(c)(3)(i)-REPEAT OF VIOLATION CITED April 25, 2014 & February 29, 2012**

Nature of Violation:

The licensee recorded the transferee's date of birth instead of the expiration date of the identification document used to identify the transferee in **(b)(3) (112 Public Law 55 125 Stat 552)** instances on the ATF

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

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6) The licensee failed to record any expiration date of the document used to identify the transferee on the ATF Forms 4473 in **(b)(3) (112 Public Law 55 125 Stat 552)** instances. These

FIREARMS INSPECTION REPORT

Name: Ace Jewelry & Loan Inc.
Trade Name:

UI#: 781080-2015-0054
FFL#: 5-75-439-02-7D-05743

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6) The licensee failed to record any identification document information on the ATF Forms 4473 transactions in (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) instances. These included transactions (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) (b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Licensee's Response:

Richard Davis stated that he though (b)(6) was checking all of the forms before they are filed. He was not sure how the omissions occurred.

Corrective Action:

Preventative action was discussed. Mr. Davis was advised to review all of the forms before the transaction was complete and the forms are filed. (Worksheet-2) (Exhibit-6) (Exhibit-4)

5. **27 CFR 478.124(c)(3)(iv)-REPEAT OF VIOLATION CITED April 25, 2014 & February 29, 2012**

Nature of Violation:

The licensee recorded the transferee's date of birth instead of the date NICS was contacted in Section 21a of the ATF Form 4473 in (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) instances. These included (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) The licensee failed to record the NICS transaction number (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) instance on the ATF Form 4473. This included (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) The licensee failed to record the date of the final response by NICS (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) instance.

Licensee's Response:

Mr. Davis stated that he though (b)(6) was checking all of the forms before they were filed.

Corrective Action:

Preventative action was discussed. Mr. Davis was advised to review all of the forms before the transaction was complete and the forms are filed. (Worksheet-2) (Exhibits 6 & 7)

6. **27 CFR 478.124(c)(4)-REPEAT OF VIOLATION CITED February 29, 2012**

Nature of Violation:

The licensee failed to record the serial number of the firearms transferred on the ATF Forms 4473 in (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) instances. (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) The licensee failed to record any gun information on (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) instance.

Licensee's Response:

Richard Davis stated that one of the transferors (b)(6) (b)(6) He did not know why the information was not recorded on the other

FIREARMS INSPECTION REPORT

Name: Ace Jewelry & Loan Inc.
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FFL#: 5-75-439-02-7D-05743

forms or why they were not reviewed before filing.

Corrective Action:

Preventative action was discussed. Mr. Davis was advised to review all of the forms before filing himself or have (b)(6) review the forms on a regular basis. (Worksheet-2) (Exhibits 6 & 7)

7. **27 CFR 478.124(c)(5)-REPEAT OF VIOLATION CITED April 25, 2014 & February 29, 2012**

Nature of Violation:

The licensee failed to sign and date the ATF Form 4473 in (b)(3) (112 Public Law 55 125 Stat 552), (b)(6) instances. The information was not recorded: (b)(3) (112 Public Law 55 125 Stat 552), (b)(6)

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

(b)(3) (112 Public Law 55 125 Stat 552), (b)(6) The licensee failed to record the date of the transaction (b)(3) (112 Public Law 55 125 Stat 552), (b)(6) instance.

Licensee's Response:

Richard Davis did not know why the forms were not completed and stated that his grandson (b)(6) has been taking care of the transaction forms.

Corrective Action:

Preventative action was discussed. Richard Davis was advised to review all of the forms himself or make sure that Kyle Davis reviews the forms on a regular basis before filing. (Worksheet-2) (Exhibits 6 & 7)

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

Nature of Violation:

The licensee failed to record the issuing State and Permit type of the document used in lieu of NICS in (b)(3) (112 Public Law 55 125 Stat 552), (b)(6) instance on the ATF Form 4473. The information was not recorded (b)(3) (112 Public Law 55 125 Stat 552), (b)(6)

Licensee's Response:

Richard Davis stated that the transferor (b)(6) and no longer works at the store.

Corrective Action:

Preventative action was discussed. Mr. Davis was advised to review all of the forms himself or make sure (b)(6) reviews the forms on a regular basis. (Worksheet-2) (Exhibit-7)

9. **27 CFR 478.129(b)-REPEAT OF VIOLATION CITED February 29, 2012**

Nature of Violation:

The licensee failed to separately file NICS "denied" transactions from completed ATF Form 4473 transactions in (b)(3) (112 Public Law 55 125 Stat 552) instances. Denied transaction forms associated with potential transferee (b)(3) (112 Public Law 55 125 Stat 552), (b)(6)

(b)(3) (112 Public Law 55 125 Stat 552), (b)(6) are not in a separate file upon examination of the records.

Licensee's Response:

FIREARMS INSPECTION REPORT

Name: Ace Jewelry & Loan Inc.
Trade Name:

UI#: 781080-2015-0054
FFL#: 5-75-439-02-7D-05743

Richard Davis stated that he thought all of the denied transactions were being filed separately.

Corrective Action:

The forms were filed in a separate file during the closing conference.

10. **27 CFR 478.124(a)**

Nature of Violation:

The licensee failed to have a non-licensee complete an ATF Form 4473 upon the transfer (b)(3) (112 Public Law 55 125 Stat 552), (b)(6)

Licensee's Response:

Richard Davis stated that that gun was picked up by (b)(6) to remove paint from the barrel of the firearm. He did not think a Form 4473 needed to be completed.

Corrective Action

The firearm was returned to the store on June 18, 2015. It was verified in inventory during the closing conference on June 30, 2015.

11. **27 CFR 102(a)**

Nature of Violation:

The licensee delivered a Glock pistol, serial number (b)(6) (b)(6) for the purpose of repair in one (1) instance. The non-licensee did not complete an ATF Form 4473 and no NICS background check was conducted prior to delivery of the firearm.

Licensee's Response:

Mr. Davis stated that the firearm was picked up by (b)(6) and knew he was not a licensee but thought it was ok since he was just going to remove paint from the barrel.

Corrective Action:

The firearm was returned to the licensee on June 18, 2015 and is currently in inventory. The licensee was reminded that no firearm may be delivered to a non-licensee without execution of an ATF Form 4473 and after contacting NICS.

Signature	IOI Title	July 7, 2015 Date of Report
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FIREARMS INSPECTION REPORT

Name: Ace Jewelry & Loan Inc.
Trade Name:

UI#: 781080-2015-0054
FFL#: 5-75-439-02-7D-05743

Index of Worksheets and Exhibits

Attachments

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NICS FFL Audit Report
VCAB Firearms Trace History
ETRACE LEAD Report
Franchise Tax Account Status
Texas SOS Officer and Director Information
Texas SOS Business Organization Query Results
Forfeited Certificate/Charter
Texas Sales and Use Tax Permit

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Worksheet-1: Inventory and A&D Review
Workhseet-2: ATF Form 4473 Review
Statistical Page

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Exhibit-1: Franchise Tax Reinstatement of Business Entity
Exhibit-2: A& D Record sample
Exhibit-3: Gun Inventory Record
Exhibit-4: Acquisition record of Glock not recorded out
 Acquisition record of S&W not in inventory
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Exhibit-5: Licensee statement from 2014 DIO Warning Conference
Exhibit-6: ATF Forms 4473 with violations
Exhibit-7: ATF Forms 4473 with violations
Exhibit-8: NICS Denied ATF Forms 4473 not filed separately
Exhibit-9: Acknowledgement



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

www.atf.gov

Certified/Return Receipt Requested

February 2, 2016

ACE JEWELRY & LOAN, INC.
Attn: Mr. & Mrs. Richard Davis
4750 E. BELKNAP
FORT WORTH, TX 76117
RE: 575439027D05743

Dear Mr. & Mrs. Davis:

During a recent inspection at your firearms business covering the period 04/01/2014 to 04/01/2015 you were cited for violations of Title 27, Code of Federal Regulations, Part 478. The violations were discussed with you or your designated responsible person during the inspection. A copy of the Report of Violations, ATF F 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 Friday 02/12/2016 at 10:00am at Ft. Worth Area Office. 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.

ACE JEWELRY & LOAN, INC.

The records you are required to maintain and the business operations you conduct are important to law enforcement in our continuing effort 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.

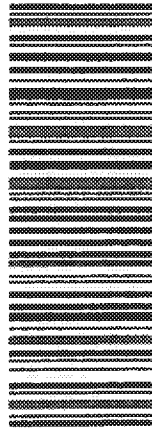
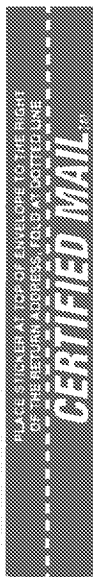
Please contact (b)(6), Ft. Worth Area Office Supervisor at (b)(6) to confirm this appointment and to ask any questions you may have regarding this conference. We look forward to meeting with you to resolve these issues.

(b)(6)

Ft. Worth Area Office Supervisor

Enclosure

c: Federal Firearms Licensing Center
Fort Worth (IO) Field Office



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7012 1640 0001 9229 8783

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RICHARD DAVIS ACE JEWELRY & LOAN INC.
Street, Apt. No.:
or PO Box No. **4750 E. BELKNAP**
City, State, ZIP+4
FORT WORTH, TX 76117

PS Form 3800, August 2005

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR. & MRS RICHARD DAVIS
ACE JEWELRY & LOAN INC
4750 E. BELKNAP
FORT WORTH, TX 76117

2. Article Number
(Transfer from service label)

7012 1640 0001 9229 8783

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Certified Mail | <input type="checkbox"/> Express Mail |
| <input type="checkbox"/> Registered | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Insured Mail | <input type="checkbox"/> C.O.D. |

4. Restricted Delivery? (Extra Fee)

☐ Yes

PS Form 3811, February 2004

Domestic Return Receipt

102596-02-M-1540



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

www.atf.gov

Certified/Return Receipt Requested

February 16, 2016

ACE JEWELRY & LOAN, INC.
ATTN: Mr. & Mrs. Richard Davis
4750 E. BELKNAP
FORT WORTH, TX 76117-
RE: 575439027D05743

Dear Mr. & Mrs. Davis:

This letter is a follow-up to the warning conference held with you or your designated representative on 02/12/2016. During this conference, the violation(s) cited during the inspection covering the period 04/01/2014 to 04/01/2015 and the necessary corrective action to prevent the violation(s) from reoccurring were discussed. Representatives with ATF that were present are

(b)(6)

Your representatives included Richard Davis, Nancy Davis, and

(b)(6)

You were given the opportunity to comment on the violation(s) and what specific action you have taken to ensure that the violation(s) will not reoccur. With respect to the violation(s) cited below, we are providing a summary of your response to each violation.

Violations 1, 10 and 11: You stated there was a misunderstanding and you were not aware that you could not send out firearms for repair to a person without the proper license. You are now aware of ATF Regulations and will not send firearms out for repair anymore. If a repair needs to be conducted it will be done on site.

ACE JEWELRY & LOAN, INC.

Violations 2 – 9: You acknowledged and took responsibility for all mistakes made on ATF Forms 4473. You provided a document signed by all employees stating all employees take responsibility for the violations and what changes have been incorporated to help prevent future violations. You also provided your new checklist that every employee will look over when checking the ATF Form 4473 for accuracy and completion. You stated you will now have a two check system on all ATF Forms 4473 before the firearm leaves the store. Your store will now conduct a monthly audit of inventory and ATF Forms 4473 to ensure you are in compliance with ATF Regulations.

The violation(s) 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 if you have any questions concerning your responsibilities as a licensee or if you require further clarification about particular requirements of Federal firearms laws.

(b)(6)

Fort Worth Area Office Supervisor

c: Federal Firearms Licensing Center
Fort Worth (IO) Field Office.

We have looked over our report of violations and acknowledged the mistakes that were made in our last inspection. We now do frequent inventory checks regarding the guns in stock and in pawn and ensure that it matches our records. The gun forms are checked more frequently also. We looked at the violation report and made a checklist of our mistakes as well as common mistakes that other companies have made based on online data. This will cut down tremendously on the amount of mistakes on our 4473 forms. In our last inspection we had a few guns that were shown to be in stock but they were not found, these guns were incorrectly sent out for repair without proper form. All repairs are now either done in the facility or proper 4473 is filled out. Acquisition and Disposition reports are printed off and inspected along side the inventory much more frequently. We are confident that these changes will eliminate future mistakes and continue with our business in selling guns.

X Richard L. Davis Pres 2-12-16

X Nancy L. Davis

2-12-16

X (b)(6)

2-12-16

Frequently missed items

1) Ensure the middle name is written in full or NMN if they have none, NO MIDDLE INITIALS.

3) Place of birth CITY AND STATE.

10a & 10b) These fields are separate and require 2 checks, one for 10a and another for 10b.

11) Ensure that 11a is YES and 11b-11k are all NO and 11L and number 12 are answered accordingly.

13) NO ABBREVIATIONS. We can only transfer guns if this answer is TEXAS.

14) Make sure number 14 is answered.

17) This is the date the form is filled out. 99.9% of the time this number will match 21a. If the gun is a proceed, it will also match 36.

20a) DO NOT ABBREVIATE!!! Make sure the expiration date on identification is valid.

Q21 is only answered if you have to call NICS, not answered if customer has CHL.

21a) This date must match the date on 17 99.9% of the time.

21b) Make sure this sequence is legible.

21c) If delayed; make sure appropriate transfer date is in the space provided.

21d) If initial response was delayed and they called us back with a new response, ensure the new response and date is provided in the line.

23) If customer has CHL, ensure the expiration date is valid.

24) If initial response was delay and the gun was transferred at a later date, ensure the customer signed when he picks up the gun.

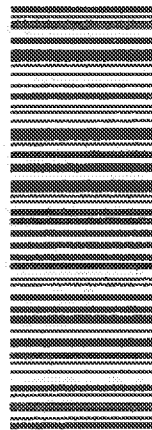
25) If initial response was delay and the gun was transferred at a later date, ensure the customer provided a new date for the day they pick it up. If initial response was delay and the gun was transferred at a later date, the recertification date will match 36.

28) Make sure you write down serial number/s.

30a) Spell out the number of guns being transferred.

36) This date will match the date on 17 or 25. This is the date the gun left our store. DAY MONTH AND YEAR!!!!

PLACE STICKER IN CENTER OF FRONT OF THE MAILPIECE. DO NOT WRITE OR SIGN OVER POSTAGE OR RETURN ADDRESS. POSTAGE PAID BY ADDRESSEE.
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Total Postage & Fees	\$	

57505743

Sent To
ACE JEWELRY & LOAN INC. MR. DAVIS
 Street, Apt. No.,
 or PO Box No. **4750 E. BELKNAP**
 City, State, ZIP+4[®]
FORT WORTH TX 76117

PS Form 3806, August 2005 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>ACE JEWELRY & LOAN INC ATTN: MR. & MRS. DAVIS 4750 E. BELKNAP FORT WORTH, TX 76117</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7012 1640 0001 9229 8806</p>

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540