

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) 3 Guy Supply LLC 3 Guy Supply <div style="border: 1px dashed black; padding: 10px; text-align: center; font-size: 24px; font-weight: bold;">(b)(6)</div>		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 773015-2016-0342-B1B		
		3. PERMIT/LICENSE NUMBER 431061017K03399	4a. TARGET DATE 9/30/2016	4b. TARGET HOURS
		5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		
6. ATF OFFICER(S) ASSIGNED <div style="border: 1px dashed black; padding: 2px;">(b)(6)</div> Lead Investigator				
7. ASSIGNED BY (SIGNATURE, TITLE AND DATE) <div style="border: 1px dashed black; padding: 2px;">(b)(6)</div> Area Supervisor, 02/26/2016				
8. PURPOSE/SPECIAL INSTRUCTIONS Conduct Firearms Disposition Emphasis Inspection. Refer to IOI <div style="border: 1px dashed black; padding: 2px;">(b)(6)</div> Chapter C – Firearms Inspections and FY 16 Domain Assessment. Conduct 100% inventory and ATF Form 4473 review unless authorized in advanced by Area Supervisor and DIO.				
9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)
NO. OF VIOLATIONS	9	NO. OF REFERRALS		2111 - PER DIEM
NO. OF TECS CHECKS	30	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 <div style="border: 1px dashed black; padding: 2px;">(b)(6)</div> - Industry Operations Investigator Submitted on: 07/21/2016 A compliance inspection was conducted beginning March 17, 2016, in conjunction with an amended qualification inspection (see 773015-2016-0341-B1B). Due to numerous instances of failing to properly maintain the bound book, a warning conference is recommended. Errors included <div style="border: 1px dashed black; padding: 2px;"> </div> instances of selling firearms on ATF Forms 4473, but failing to log those firearms into or out of the bound book. Please see narrative report for further details. Viols WC with WL and Recall				
12. TIME ACCOUNTING DATA				
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		<div style="border: 1px dashed black; padding: 2px;">(b)(6)</div>		
MAR 2016	21.00			
APR 2016	6.00			
JUN 2016	1.50			
JUL 2016	28.50			
ATF OFFICER'S SUBTOTAL	57.00	ATF OFFICER'S SIGNATURE		
TOTAL HOURS	57.00			

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) 3 Guy Supply LLC 3 Guy Supply <div style="border: 1px dashed black; padding: 10px; text-align: center; font-size: 2em;">(b)(6)</div>	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 773015-2016-0342-B1B		
	3. PERMIT/LICENSE NUMBER 431061017K03399	4a. TARGET DATE 9/30/2016	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Agree with IOIs recommendation of Violations, Warning Conference with Warning Letter, Recall.

Licensee failed to properly maintain bound book records. These errors include ☐ firearms that were acquired and then disposed of on ATF Forms 4473 without being logged into the bound book. Of the ☐ firearms found in inventory, ☐ had not been logged into the bound book. An additional ☐ errors were noted in bound book, including incorrect or missing dates, missing serial numbers, and incomplete information regarding from whom firearms were acquired. This equals an error rate of 45% for acquisition entries and 17% for disposition entries.

Viols WC with WL and Recall

☒ REVIEWED

☒ CONCUR

☒ SEE COMMENTS

☐ FINAL DISPOSITION

SIGNATURE AND TITLE

(b)(6) Area Supervisor

REVIEW DATE

07/22/2016

REVIEW COMMENTS AND RECOMMENDATION

Viols WC with WL and Recall

☒ REVIEWED

☒ CONCUR

☐ SEE COMMENTS

☒ FINAL DISPOSITION

SIGNATURE AND TITLE

JALEDoux - Director Industry Operations

REVIEW DATE

07/22/2016

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 3 Guy Supply LLC 3 Guy Supply	Street Address (b)(6)	City (b)(6)	State (b)(6)	Zip Code (b)(6)	County (b)(6)	Page 1 of 7 Pages
License/Permit/Registry Number (If any) 431061017K03399	Expiration Date 10/1/2017	Date(s) or Period of Inspection 03/17/2016 through 07/18/2016				

Inspection Results

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

Number: 1

Nature of Violation:

Failure of ☐ ATF Forms 4473 to furnish all of the information as indicated by the headings or instructions

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

For future transactions, all information should be furnished on the Form as indicated by the headings or instructions.

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

Citation: 27 CFR 478.21(a)

Report of Violations

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Name of Proprietor 3 Guy Supply LLC 3 Guy Supply	Street Address (b)(6)	City (b)(6)	State (b)(6)	Zip Code (b)(6)	County (b)(6)	Page 2 of 7 Pages
License/Permit/Registry Number (If any) 431061017K03399	Expiration Date 10/1/2017	Date(s) or Period of Inspection 03/17/2016 through 07/18/2016				

Inspection Results

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

Number: 2

Nature of Violation:

Failure in ☐ (112 Public Law 55 125 Stat 552) to obtain a properly completed ATF Form 4473 from the customer.

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

Citation: 27 CFR 478.124(c)(1)

Number: 3

Nature of Violation:

Failure in ☐ instances to properly verify the identity of the transferee:

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

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

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

For future transactions, prior to transferring a firearm to a nonlicensee, the licensee should obtain a Form 4473 that shows the customer's name, sex, residence address, date and place of birth, height, weight, race, country of citizenship, alien ID number if applicable, state of residence, and a certification by the customer that he or she is not prohibited from possessing firearms.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

For future transactions, after the transferee has executed the Form 4473, the licensee should verify the identity of the transferee by examining the identification document presented, and should note on the Form 4473 the type of identification used.

Report of Violations

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Name of Proprietor 3 Guy Supply LLC 3 Guy Supply	Street Address (b)(6)	City (b)(6)	State (b)(6)	Zip Code (b)(6)	County (b)(6)	Page 3 of 7 Pages
License/Permit/Registry Number: (If any) 431061017K03399	Expiration Date 10/1/2017	Date(s) or Period of Inspection 03/17/2016 through 07/18/2016				

Inspection Results

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

Number: 4

Nature of Violation:

Failure in ☐ instances to record complete information regarding contacting the NICS system:

(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)

For all future transfers, the licensee should record the date NICS was contacted as well as any response provided by the system.

Number: 5

Nature of Violation:

Failure in ☐ instances to record on ATF Form 4473 complete information regarding the firearm to be transferred:

(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)

For future transfers, the licensee should record on the 4473 the name of the manufacturer, importer (if any), the type, model, caliber or gauge and serial number of the firearm to be transferred.

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report

Please write firmly with a ballpoint pen in the space provided. Do not use ink. The remainder of the form is for the use of the Bureau.

Name of Proprietor

3 Guy Supply LLC

3 Guy Supply

License/Permit/Registry No.

431061017K03399

An examination of your premises,

Citation: 27 CFR 478.124(c)(4)

Number: 6

Nature of Violation

Failure to maintain records in accordance with 27 CFR 478.124(c)(4)

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

Citation: 27 CFR 478.124(c)(5)

(b)(6)

Instructions to the Manufacturer

Action to be Taken

For a full and complete understanding of the 173 Federal Reserve Act, the 173 Federal Reserve Act is the only source of information regarding the Federal Reserve Act.

Report of Violations

Instructions

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Name of Proprietor 3 Guy Supply LLC 3 Guy Supply	Street Address (b)(6)	City (b)(6)	State (b)(6)	Zip Code (b)(6)	County (b)(6)	Page 5 of 7 Pages
License/Permit/Registry Number (If any) 431061017K03399	Expiration Date 10/1/2017	Date(s) or Period of Inspection 03/17/2016 through 07/18/2016				

Inspection Results

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

Number: 7

Nature of Violation:

Failure in (b)(3) (112 Public Law 55 125 Stat 552) to prepare a report of multiple sales:

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

Failure in (b)(3) instances to prepare a report of multiple sales in a timely manner:

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

Citation: 27 CFR 478.126a

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The unreported multiple sale should be reported on ATF Form 3310.4. For future transactions, the licensee should prepare a report of multiple sales or other disposition whenever the licensee disposes of two or more handguns to an unlicensed person within five consecutive business days. The report should be prepared on ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers, and should be forwarded to ATF and the local law enforcement agency no later than close of business on the day the multiple sale occurs.

Report of Violations

Instructions

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Name of Proprietor 3 Guy Supply LLC 3 Guy Supply	Street Address (b)(6)	City	State	Zip Code	County	Page 6 of 7 Pages
License/Permit/Registry Number (if any) 431061017K01399	Expiration Date 10/1/2017	Date(s) or Period of Inspection 03/17/2016 through 07/18/2016				

Inspection Results

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

Number: 8

Nature of Violation:

Failure, in a total of ☐ instances, to properly record information in the acquisition and disposition bound book.

In ☐ instances, firearms were found in inventory but were not logged into the bound book:

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

In ☐ instances, incomplete disposition information was recorded:

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

In ☐ instances, acquisition information was either untimely or incorrect. In ☐ of those instances, the acquisition information was incorrect/incomplete. In ☐ instances, firearms were transferred without any acquisition information being recorded in the bound book.

In ☐ instances, those same firearms were also transferred without any disposition information being recorded in the bound book.

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

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

Where possible, log book entries should be corrected. For future entries, timely and accurate entries should be made. Acquisitions should be made no later than the close of the next business day and should include the manufacturer, importer, model, serial number, type, caliber or gauge, date acquired and name and address or name and FFL number of the person from whom the firearm was acquired. Dispositions should be made within 7 days, and should include the date, the transferee's name and address or name and FFL number, or the Form 4473 serial number.

Report of Violations

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License/Permit/Registry Number (if any) 431061017K03399	Expiration Date 10/1/2017	Date(s) or Period of Inspection 03/17/2016 through 07/18/2016				

Inspection Results

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

Please see Attachment A

Citation: 27 CFR 478.125(e)

Number: 9

Nature of Violation:

Failure to maintain required records at the licensed premises for a period of at least one year prior to the inspection.

Citation: 27 CFR 478.121(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken: Required records shall be retained on the licensed premises.

(If not corrected immediately)

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

Date

7/18/2016

Signature

(b)(6)

Industry Operations Investigator

Date

7/18/16

For Office

Attachment A to ATF Form 5030.5, Report of Violations

3 Guy Supply LLC

773015-2016-0342-B1B

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

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

FIREARMS INSPECTION REPORT

Name: 3 Guy Supply LLC
Trade Name: 3 Guy Supply

UI#: 773015-2016-0342-B1B
FFL#: 4-31-061-01-7K-03399

Address:

(b)(6)

1 - Introduction

Inspection Profile:

A compliance inspection was conducted beginning March 17, 2016, by Industry Operations Investigator (b)(6). Also present and participating in the inspection were responsible persons Tom Woolery, Darryl Hadfield and Ryan Gallagher. Responsible person John Johnston did not participate. There were no other participants from other agencies. The scope was disposition emphasis, and the inspection covered the period of March 17, 2015 to March 17, 2016.

The inspection was conducted in conjunction with an amended qualification and was not conducted at the Northwood Drive address. The licensee was not storing required records at that address. The inspection took place at two locations: Darryl Hadfield's residence (originally listed on the amended application as the new premises address) and a commercial space at 2300 Montana Avenue in Cincinnati (the final amended address). Submission of the compliance inspection assignment was delayed while the licensee attempted to find a location in compliance with zoning regulations.

Please also see 773015-2016-0341-B1B.

Business Profile:

3 Guy Supply LLC has held this FFL since 2011. The FFL was originally licensed out of a residence in Cincinnati, Ohio, and is now located in a commercial office space in Cincinnati. To date, the licensee has been making low to medium volume sales of hand guns, long guns and receivers to family, friends and the general public. Darryl Hadfield stated that they may consider reapplying for a manufacturer's license, and may also consider selling National Firearms Act (NFA) items.

In the past 12 months, the licensee has acquired and disposed of (b)(4) firearms. Most sales (b)(4) are of new firearms, and (b)(4) of transfers are handguns. The licensee does have a website – 3guysupply.com – and also maintains a Facebook page. The licensee stated that firearms are not sold over the website, but that the website is used more for advertising purposes. Suppliers include (b)(4). The licensee has no other ATF licenses, no off-site storage and does not sell at gun shows. Per the City of Cincinnati zoning department, the new location at 2300 Montana Avenue is

FIREARMS INSPECTION REPORT

Name: 3 Guy Supply LLC
Trade Name: 3 Guy Supply

UI#: 773015-2016-0342-B1B
FFL#: 4-31-061-01-7K-03399

properly zoned.

Ownership and Control:

3 Guy Supply is licensed as an LLC. A query of the Ohio Secretary of State website shows that the LLC was first registered with the State in 2011, and was amended in 2016 to add Darryl Hadfield as an agent.

When the FFL was first issued, three responsible persons were listed: Tom Woolery, Ryan Gallagher and Douglas Cooper. Douglas Cooper's residence was also the original business premises location. When submitting the amended application, the FFL also requested that the Federal Firearms Licensing Center remove Douglas Cooper as a responsible person, and add Darryl Hadfield and John Johnston. The information that is currently listed in the Federal Licensing System appears correct. Hidden ownership is not suspected.

Variance:

N/A – the licensee has no variances on file and requested no new variances.

2 - Recommendation

Violations, Warning Conference with Warning Letter, Recall

The recommendation is based on the licensee's failure to properly maintain bound book records. These errors include ☐ firearms that were acquired and then disposed of on ATF Forms 4473 without being logged into the bound book. Of the ☐ firearms found in inventory, ☐ had not been logged into the bound book. An additional ☐ errors were noted in bound book, including incorrect or missing dates, missing serial numbers, and incomplete information regarding from whom firearms were acquired. This equals an error rate of 45% for acquisition entries and 17% for disposition entries.

3 - Inspection History

Date of Inspection: 09/02/2011
Type of Inspection: Qualification
UI#: 773015-2011-0573-B1B
Inspection Results: Approval Recommended
Cited Violations: None

FIREARMS INSPECTION REPORT

Name: 3 Guy Supply LLC
Trade Name: 3 Guy Supply

UI#: 773015-2016-0342-B1B
FFL#: 4-31-061-01-7K-03399

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

A full inventory was conducted and the licensee's bound book was reviewed. The following errors and discrepancies were noted:

- Four firearms were in inventory, while the log book contained only [] open dispositions. [] firearms that were in inventory had not been logged into the bound book;
- In [] instances, incomplete disposition information was recorded;
- In [] instances, incomplete acquisition information was recorded;
- And in another [] instances [] each acquisition and disposition), the licensee transferred firearms on ATF Forms 4473 without recording the acquisition or disposition information in the bound book. .

IOI (b)(6) traced [] firearms through the FFL's records. No additional discrepancies were discovered. No trafficking issues or obliterated serial numbers were noted. The licensee has not reported any thefts or losses of firearms.

Currently, the licensee has no formal internal control policies in place regarding bound book records. In addition to the bound book errors, the licensee was also not storing the required records at the licensed premises. Instead, records were being stored at Tom Woolery's house. Records were brought to Mr. Hadfield's residence and the new office space for review during the inspection.

As a result of these violations, the licensee was cited for violations of 27 CFR 478.125(e) and 27 CFR 478.121(a).

See Worksheet 1, Violations 8 and 9, and Exhibit 8.

5 - ATF Forms 4473 – NICS & Other Dispositions

An appointment was made to conduct the amended qualification and the compliance inspection concurrently at Mr. Hadfield's residence. Upon arriving at the residence, IOI (b)(6) noted that ATF Forms 4473 and the bound books were spread out on the table and Mr. Woolery appeared to be completing the bound book. IOI (b)(6) asked Mr. Woolery to stop making any additional changes to the records, and he did so. When IOI (b)(6) began reviewing the Forms, Mr. Woolery handed over a portion of the Forms and kept another stack for himself. IOI (b)(6) asked to see those as well. Mr. Woolery said that he "just had something he wanted to look at". IOI (b)(6) asked if the Forms contained something he didn't want her to see and he repeated, "No, I'm just looking at them". IOI (b)(6) then reviewed the stack she was originally given and noted that many of the ATF 4473 serial numbers were missing. IOI (b)(6) then insisted on seeing the remaining Forms that had been kept aside. Each Form in the second stack contained

FIREARMS INSPECTION REPORT

Name: 3 Guy Supply LLC
Trade Name: 3 Guy Supply

UI#: 773015-2016-0342-B1B
FFL#: 4-31-061-01-7K-03399

some kind of error or discrepancy.

After obtaining all Forms, it was noted that, for the past 12 months, ATF Forms 4473 were on hand. Each was reviewed. Errors and discrepancies noted included:

- On ATF Forms 4473, the licensee did not furnish all of the information as indicated by the headings or instructions;
- On (b)(3) (112 Public Law 55 125 Stat 552) 4473 the FFL failed to obtain a properly completed Form from the customer;
- On ATF Forms 4473 the FFL failed to properly verify the identity of the transferee;
- On ATF Forms 4473 the FFL failed to record complete information regarding contacting the NICS system;
- On ATF Forms 4473 the licensee failed to properly record complete information regarding the firearm to be transferred;
- And on (b)(3) (112 Public Law 55 125 Stat 552) 4473 the FFL failed to correctly date the Form.

No firearms are sold to law enforcement officers, and firearms transferred to other FFL's were documented correctly. No trafficking issues were noted. An FBI NICS audit log was compared to recent transactions. No discrepancies were noted.

As a result of the various errors and discrepancies, the licensee was cited for violations of 27 CFR 478.21(a), 27 CFR 478.124(c)(1), 27 CFR 478.124(c)(3)(i), 27 CFR 478.124(c)(3)(iv), 27 CFR 478.124(c)(4) and 27 CFR 478.124(c)(5).

Currently, the licensee has no procedures in place for reviewing Forms for errors. Mr. Hadfield said he was considering using electronic Forms in order to reduce errors.

See Worksheet 2, Violations 1-6, and Exhibits 1-6.

6 - Multiple Sales

In the past 12 months, the licensee has conducted multiple sales involving a total of firearms. Of those multiple sales, were reported but not in a timely manner. **(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)** was not reported.

See Worksheet 2, Violation 7 and Exhibit 7.

7 - Suspicious/Prohibited Purchasers

No possible traffickers or straw purchasers were noted. Criminal history checks (NCIC/NLETS via OpenFox) were conducted on customers as recorded on the NCIC-NLETS Queries worknote. An additional checks were conducted on each of the responsible persons on the license for a total of checks. No hits resulted.

FIREARMS INSPECTION REPORT

Name: 3 Guy Supply LLC
Trade Name: 3 Guy Supply

UI#: 773015-2016-0342-B1B
FFL#: 4-31-061-01-7K-03399

8 - Trace Activity

In the past 12 months, the licensee has had [] successful traces and no unsuccessful traces. [] used firearms were chosen for secondary market review. Queries were also conducted on [] additional firearms as recorded on the NCIC-NLETS Queries worknote for a total of [] checks. Queries did not result in any hits.

9 - NFA/Importer/Collector/Manufacturer

N/A – the licensee does not conduct any business in the above areas.

10 - Referrals

N/A – no referrals were generated as a result of this inspection.

11 - Other

Deconfliction –

IOI [(b)(6)] conducted checks through OpenFox and NForce on March 1 and the ATF Columbus Field Intelligence Group on April 25. No negative information was disclosed.

Child Safety Lock Act –

The licensee stated that they are in compliance with the CSLA.

Youth Handgun Safety Act –

IOI [(b)(6)] provided a new poster and brochures for the new location.

12 - Closing Actions

A closing conference for the amended qualification (773015-2016-0341-B1B) was conducted on July 1, 2016. IOI [(b)(6)] Tom Woolery and Darryl Hadfield were present. At that time, IOI [(b)(6)] conducted the Acknowledgement of Federal Firearms Regulations, which was signed by Darryl Hadfield.

A closing conference for the compliance inspection was held on July 18, 2016. In attendance were IOI [(b)(6)] and Tom Woolery. IOI [(b)(6)] issued the Report of Violations, which Mr. Woolery signed.

IOI [(b)(6)] also provided the licensee with a copy of ATF P 5300.15, Federal Firearms Licensee Quick Reference and Best Practices Guide. The Area Office telephone number as well as IOI [(b)(6)] phone number and email address were also provided.

FIREARMS INSPECTION REPORT

Name: 3 Guy Supply LLC
Trade Name: 3 Guy Supply

UI#: 773015-2016-0342-B1B
FFL#: 4-31-061-01-7K-03399

See Exhibit 9.

13 - Violations

1. **27 CFR 478.21(a)**

Nature of violation:

Failure on ATF Forms 4473 to furnish all of the information as indicated by the headings or instructions:

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

Licensee's response:

The licensee had no response.

Corrective action:

The licensee was reminded that all information should be furnished on the Form as indicated by the headings or instructions.

See Worksheet 2 and Exhibit 1.

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

Nature of violation:

Failure in to obtain a properly completed ATF Form 4473 from the customer:

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

Licensee's response:

The licensee had no response.

Corrective action:

The licensee was reminded that prior to transferring a firearm to a nonlicensee, the licensee should obtain a Form 4473 from the customer that shows the customer's name,

FIREARMS INSPECTION REPORT

Name: 3 Guy Supply LLC
Trade Name: 3 Guy Supply

UI#: 773015-2016-0342-B1B
FFL#: 4-31-061-01-7K-03399

sex, residence address, date and place of birth, height, weight, race, country of citizenship, alien ID number if applicable, state of residence, and a certification by the customer that he or she is not prohibited from possessing firearms. IOI (b)(6) ran individual through NCIC and no hits were disclosed.

See Worksheet 2 and Exhibit 2.

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

Nature of violation:

Failure in [] instances to properly verify the identity of the transferee:

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

Licensee's response:

The FFL had no response.

Corrective action:

The licensee was instructed that, after the transferee has executed the Form 4473, the licensee should verify the identity of the transferee by examining a valid identification document, and should note on the Form 4473 the type of identification used.

See Worksheet 2 and Exhibit 3.

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

Nature of violation:

Failure in [] instances to record complete information regarding contacting the NICS system:

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

Licensee's response:

The licensee stated that he must have been distracted.

Corrective action:

The licensee was instructed to record the date NICS was contacted as well as any response provided by the system.

FIREARMS INSPECTION REPORT

Name: 3 Guy Supply LLC
Trade Name: 3 Guy Supply

UI#: 773015-2016-0342-B1B
FFL#: 4-31-061-01-7K-03399

See Worksheet 2 and Exhibit 4.

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

Nature of violation:

Failure in instances to record on ATF Form 4473 complete information regarding the firearm to be transferred:

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

Licensee's response:

Mr. Woolery had no response.

Corrective action:

The licensee was reminded that each ATF Form 4473 should accurately reflect the manufacturer, importer (if any), the type, model, caliber or gauge and serial number of the firearm to be transferred.

See Worksheet 2 and Exhibit 5.

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

Nature of violation:

Failure in to correctly date the ATF Form 4473:

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

Licensee's response:

The licensee stated that sometimes, especially if a customer has been delayed, he accidentally records the wrong date in #36.

Corrective action:

The licensee was reminded that he should sign and accurately date the 4473 if the licensee does not know or have reasonable cause to believe that the transferee is disqualified by law from receiving the firearm.

See Worksheet 2 and Exhibit 6.

7. **27 CFR 478.126a**

FIREARMS INSPECTION REPORT

Name: 3 Guy Supply LLC
Trade Name: 3 Guy Supply

UI#: 773015-2016-0342-B1B
FFL#: 4-31-061-01-7K-03399

Nature of violation:

Failure in to prepare a report of multiple sales:

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

Failure in instances to prepare a report of multiple sales in a timely manner:

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

Licensee's response:

The licensee stated he was not aware that the unreported multiple sale had not been reported. He had no explanation regarding the late multiple sale forms.

Corrective action:

On March 17th, IOI instructed Mr. Woolery to immediately report the unreported multiple sale on ATF Form 3310.4. IOI verified that this was completed by reviewing a Multiple Sale Summary from the National Tracing Center (entered date – April 29, 2016).

The licensee was also instructed that, for future transactions, he should prepare a report of multiple sales or other disposition whenever the licensee disposes of two or more handguns to an unlicensed person within five consecutive business days. The report should be prepared on ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers, and should be forwarded to ATF and the local law enforcement agency no later than close of business on the day the multiple sale occurs.

See Worksheet 2 and Exhibit 7.

8. **27 CFR 478.125(e)**

Nature of violation:

Failure, in a total of instances, to properly record information in the acquisition and disposition bound book.

In instances, firearms were found in inventory but were not logged into the bound book:

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

FIREARMS INSPECTION REPORT

Name: 3 Guy Supply LLC
Trade Name: 3 Guy Supply

UI#: 773015-2016-0342-B1B
FFL#: 4-31-061-01-7K-03399

In ☐ instances, incomplete disposition information was recorded:

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

In ☐ instances, acquisition information was either untimely or incorrect. In ☐ of those instances, the acquisition information was incorrect/ incomplete. In ☐ instances, firearms were transferred without any acquisition information being recorded in the bound book.

In ☐ instances, those same firearms were also transferred without any disposition information being recorded in the bound book.

(Due to the amount of space needed to list each of the errors, the FFL was provided with Attachment A to supplement the Report of Violations. Please see the Report of Violations or Worksheet 1.)

Licensee's response:

Mr. Woolery stated that, because the records were not being stored at the licensed premises, he was only updating the log book on an occasional basis and that was leading to the errors.

Corrective action:

During the closing conference for the amended qualification inspection, IOI ☐ (b)(6) noted that recent entries are now being completed with all the required information. IOI ☐ (b)(6) also verified that bound book entries were corrected where possible.

IOI ☐ (b)(6) instructed the licensee that, for future entries, timely and accurate entries should be made. Acquisitions should be made no later than the close of the next business day and should include the manufacturer, importer, model, serial number, type, caliber or gauge, date acquired and name and address or name and FFL number of the person from whom the firearm was acquired. Dispositions should be made within 7 days, and should include the date, the transferee's name and address or name and FFL number, or the Form 4473 serial number.

See Worksheet 1 and Exhibit 8.

9. **27 CFR 478.121(a)**

Nature of violation:

FIREARMS INSPECTION REPORT

Name: 3 Guy Supply LLC
Trade Name: 3 Guy Supply

UI#: 773015-2016-0342-B1B
FFL#: 4-31-061-01-7K-03399

Failure to maintain required records at the licensed premises for a period of at least one year prior to the inspection.

Licensee's response:

3 Guy Supply was originally licensed at the residence of former RP Douglas Cooper. Tom Woolery explained that Mr. Cooper had begun having renters at the house, and he also had concerns that [REDACTED (b)(6)]. He stated that he therefore began keeping the required records at his residence. He stated that he continued to conduct transfers at Mr. Cooper's residence, but he no longer felt comfortable going inside Mr. Cooper's house, so he stated he therefore made transfers from Mr. Cooper's driveway while using his cell phone to contact NICS. Mr. Woolery admitted to having removed the records at least one year prior to submitting the amended application.

Corrective action:

The license was instructed that required records shall be retained on the licensed premises.

X

Industry Operations Investigator

Index of Worksheets and Exhibits

1. Report of Violations

FIREARMS INSPECTION REPORT

Name: 3 Guy Supply LLC
Trade Name: 3 Guy Supply

UI#: 773015-2016-0342-B1B
FFL#: 4-31-061-01-7K-03399

2. Worksheet 1
3. Worksheet 2
4. Exhibit 1 – Samples of ATF Forms 4473 – Violation 1
5. Exhibit 2 – Copy of ATF Form 4473 – Violation 2
6. Exhibit 3 – Samples of ATF Forms 4473 – Violation 3
7. Exhibit 4 – Samples of ATF Forms 4473 – Violation 4
8. Exhibit 5 – Samples of ATF Forms 4473 – Violation 5
9. Exhibit 6 – Copy of ATF Form 4473 – Violation 6
10. Exhibit 7 – Copies of ATF Forms 4473 and multiple handgun report – Violation 7
11. Exhibit 8 – Copy of bound book – Violation 8
12. Exhibit 9 – Acknowledgement of Federal Firearms Regulations
13. Worknotes



Bureau of Alcohol, Tobacco,
Firearms and Explosives

550 Main Street, Room 8-507
Cincinnati, OH 45202

AUG 11 2016
www.atf.gov

UI# 773015-2015-0342-B1B: JL
5373

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

3 Guy Supply LLC

(b)(6)

RE: FFL 4-31-061-01-7K-03399

Dear Mr. Hadfield,

During a recent inspection at your firearms business covering the period March 17, 2015, to March 17, 2016, you were cited for violations of Title 27, Code of Federal Regulations, Part 478. The violations were discussed with you during the inspection.

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 Monday, August 22, 2016, at 1:00 pm at the ATF Cincinnati Area Office, 550 Main Street, Suite 8-507, Cincinnati, OH., 45202. 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 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.

3 Guy Supply LLC

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)**, Acting Area 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.

Sincerely yours,

(b)(6)

Acting Area Supervisor

cc: Federal Firearms Licensing Center
Cincinnati II Field Office Correspondence File
Licensee's File



Bureau of Alcohol, Tobacco,
Firearms and Explosives
550 Main Street, Room 8-507
Cincinnati, OH 45202

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UI# 773015-2015-0342-B1B: JL
5440

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Darryl Hadfield & Mr. Ryan Gallagher
3 Guy Supply LLC
2842 Viki Terrace
Cincinnati, OH 45211

RE: FFL 4-31-061-01-7K-03399

Dear Mr. Hadfield & Mr. Gallagher,

This letter is a follow-up to the warning conference held with you on August 22, 2016, by Acting Area Supervisor, (b)(6). Also in attendance was Industry Operations Investigator, (b)(6). During this conference, the violations cited during the inspection, covering the period March 17, 2015, to March 17, 2016, and the necessary corrective actions to prevent the violations from reoccurring, 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 reoccur. You stated that you have been working to make corrections to your business practices; for example, you stated that you have instituted a policy of checking and double checking ATF Forms 4473 in order to ensure that they are completely and accurately filled out. You stated that firearms acquisition and disposition records will be updated the day of the transaction. And you also stated that you are considering using the Coloseum Software product "AIMI" for electronic bound book records, e-4473's and the FBI NICS E-Check system.

3 Guy Supply LLC

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. Should you have any questions regarding this matter, please contact Area Supervisor, (b)(6), at (b)(6).

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.

Sincerely yours,

(b)(6)

Acting Area Supervisor

cc: Federal Firearms Licensing Center
Cincinnati II Field Office Correspondence File
Licensee's File



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3 Guy Supply LLC

(b)(6)

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3 Guy Supply LLC

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Sincerely yours,

(b)(6)

Acting Area Supervisor

cc: Federal Firearms Licensing Center
Cincinnati II Field Office Correspondence File
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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Darryl Hadfield & Mr. Ryan Gallagher
3 Guy Supply LLC
2842 Viki Terrace
Cincinnati, OH 45211

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(b)(6)

Acting Area Supervisor

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