

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) BKB Outdoors Inc 10Ring.com 12779 Jones Rd.; Ste. 103B Houston, TX 77070, Harris - 201	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) <p style="text-align: center;">782075-2018-0356-B1B</p> 3. PERMIT/LICENSE NUMBER 4a. TARGET DATE 4b. TARGET HOURS <p style="text-align: center;">576201019D02612 9/30/2018</p> 5. REQUESTED BY (SIGNATURE, TITLE AND DATE)
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6. ATF OFFICER(S) ASSIGNED
(b)(6)/(b)(7)(C) Lead Investigator

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
(b)(6)/(b)(7)(C) Investigative Analyst, 07/17/2018

8. PURPOSE/SPECIAL INSTRUCTIONS

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC	10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	10	NO. OF REFERRALS		2111 - PER DIEM
NO. OF TECS CHECKS	12	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)/(b)(7)(C) - Industry Operations Investigator

Submitted on: 10/23/2018
 An alternate recommendation is suggested in lieu of Violations and Revocation; Denial of Renewal Application, which is mandated under the Administrative Action policy as a result of one violation. The director/responsible person accepted responsibility for the error, and has implemented an employee training program and new policies to strengthen internal controls. The employee who reconciled the inventory retired from a career in financial risk assessment and has been designated as the ATF Compliance Officer. The director/responsible person stated he will supervise business operations to ensure employees are implementing and following ATF policies and procedures. An alternate recommendation of Violations DIO (or Delegate) Held Warning Conference in Lieu of Revocation is suggested.

Viols DIO (or Delegate) Held WC ILO Revocation

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)/(b)(7)(C)	
JUL 0	17.00		
AUG 0	71.00		
SEP 0	11.00		
OCT 0	3.00		
DEC 0	8.00		
ATF OFFICER'S SUBTOTAL	110.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	110.00		

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13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

An alternate recommendation of Violations DIO (or Delegate) Held Warning Conference in Lieu of Revocation is suggested in lieu of Violations and Revocation; Denial of Renewal Application, which is mandated under the Administrative Action policy, as a result of one violation. The director/responsible person accepted responsibility for the errors, and has implemented an employee training program and new policies to strengthen internal controls. Improved compliance is expected.

Viols DIO (or Delegate) Held WC ILO Revocation

REVIEWED
 CONCUR
 SEE COMMENTS
 FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6)/(b)(7)(c) Area Supervisor	REVIEW DATE 09/21/2018
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REVIEW COMMENTS AND RECOMMENDATION

During this inspection, there were ten violations cited. One of these violations warrants a recommendation of revocation for not retaining an ATF Form 4473 for a transferred firearm. I concur with this proposed recommendation.

Viols DIO (or Delegate) Held WC ILO Revocation

REVIEWED
 CONCUR
 SEE COMMENTS
 FINAL DISPOSITION

SIGNATURE AND TITLE TLCARTER - Director, Industry Operations	REVIEW DATE 10/23/2018
-----------------------------------------------------------------	---------------------------

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 BKB Outdoors Inc 10Ring.com	Street Address 12779 Jones Rd.; Ste. 103B	City Houston	State TX	Zip Code 77070-	County Harris - 201	Page 1 of 8 Pages
License/Permit/Registry Number <i>(If any)</i> 576201019D02612	Expiration Date 4/1/2019	Date(s) or Period of Inspection 07/31/2018 through 08/30/2018				

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 to record, or correctly record, the acquisition or disposition of firearms in the A&D Record.

A total of instances.

See Addendum to Violation No. 1

Citation: 27 CFR 478.125(e)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Number: 2

Nature of Violation:

Failure to furnish all the required information on the ATF Form 4473.

A total of forms.

See Addendum to Violation No. 2

Citation: 27 CFR 478.21(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

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License/Permit/Registry Number <i>(If any)</i> 576201019D02612	Expiration Date 4/1/2019	Date(s) or Period of Inspection 07/31/2018 through 08/30/2018				

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:

Failure to obtain the transferee's required information on the ATF Form 4473.

A total of forms.

See Addendum to Violation No. 3

Citation: 27 CFR 478.124(c)(1)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Report of Violations

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License/Permit/Registry Number <i>(If any)</i> 576201019D02612	Expiration Date 4/1/2019	Date(s) or Period of Inspection 07/31/2018 through 08/30/2018				

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 to identify the transferee by examining the identification document and noting the type of identification used on the ATF Form 4473.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)/(b)(7)(C)

A total of forms.

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

Report of Violations

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License/Permit/Registry Number <i>(If any)</i> 576201019D02612	Expiration Date 4/1/2019	Date(s) or Period of Inspection 07/31/2018 through 08/30/2018				

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:

Failure to completely and accurately record the NICS response on the ATF Form 4473.

A total of forms.

See Addendum to Violation No. 5

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)

Report of Violations

Instructions

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Name of Proprietor BKB Outdoors Inc 10Ring.com	Street Address 12779 Jones Rd.; Ste. 103B	City Houston	State TX	Zip Code 77070-	County Harris - 201	Page 5 of 8 Pages
License/Permit/Registry Number <i>(If any)</i> 576201019D02612	Expiration Date 4/1/2019	Date(s) or Period of Inspection 07/31/2018 through 08/30/2018				

Inspection Results

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

Number: 6

Nature of Violation:

Failure to sign and date the ATF Form 4473.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

A total of forms.

Citation: 27 CFR 478.124(c)(5)

Report of Violations

Instructions

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Name of Proprietor BKB Outdoors Inc 10Ring.com	Street Address 12779 Jones Rd.; Ste. 103B	City Houston	State TX	Zip Code 77070-	County Harris - 201	Page 6 of 8 Pages
License/Permit/Registry Number <i>(If any)</i> 576201019D02612	Expiration Date 4/1/2019	Date(s) or Period of Inspection 07/31/2018 through 08/30/2018				

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 to complete the NICS background check before returning firearms to a consignor.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

instance.

Citation: 27 CFR 478.102(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Number: 8

Nature of Violation:

Failure to record the return of firearms to a consignor on the ATF Form 4473.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

instance.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Report of Violations

Instructions

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

Name of Proprietor BKB Outdoors Inc 10Ring.com	Street Address 12779 Jones Rd.; Ste. 103B	City Houston	State TX	Zip Code 77070-	County Harris - 201	Page 7 of 8 Pages
License/Permit/Registry Number <i>(If any)</i> 576201019D02612	Expiration Date 4/1/2019	Date(s) or Period of Inspection 07/31/2018 through 08/30/2018				

Inspection Results

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

Citation: 27 CFR 478.124(a)

Number: 9

Nature of Violation:

Failure to retain the ATF Form 4473 for a period of not less than 20 years from the date of sale or disposition, and failure to retain the ATF Form 4473 for a period of not less than five years from the date of the NICS inquiry for a denied transaction.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

A total of instances.

Citation: 27 CFR 478.129(b)

Report of Violations

Instructions

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License/Permit/Registry Number <i>(If any)</i> 576201019D02612	Expiration Date 4/1/2019	Date(s) or Period of Inspection 07/31/2018 through 08/30/2018				

Inspection Results

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

Number: 10

Nature of Violation:

Failure to report the multiple sales of pistols and revolvers.

A total of multiple sales involving handguns.

See Addendum to Violation No. 10

Citation: 27 CFR 478.126a

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

I Have Received	(b)(6)/(b)(7)(C)	(Proprietor's signature and title) <i>President</i>	Date <i>8/30/18</i>
	(b)(6)/(b)(7)(C)	<i>Industry Operations Investigator</i>	Date <i>08/30/18</i>

Addendum to Violation No. 1

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

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

A total of instances.

Addendum to Violation No. 2

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

A total of forms.

Addendum to Violation No. 3

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

A total of forms.

Addendum to Violation No. 5

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

A total of forms.

Addendum to Violation No. 10

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

A total of eight multiple sales involving handguns.

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com
Address: 12779 Jones Road, Suite 103B
Houston, Texas 77070

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

1 - Introduction

Inspection Profile:

An ATF Southwest Border Recall Inspection was conducted at the licensed business premises of BKB Outdoors, Inc., holder of a Type 01 (Dealer of Firearms Other Than Destructive Devices), license. Industry Operations Investigator (IOI) (b)(6)/(b)(7)(C) conducted the on-site inspection from 07/31/18 to 08/30/18. This inspection is the licensee's fifth and covered the period 07/31/17 through 08/30/18. Director Bryan Brassell and employee (b)(6)/(b)(7)(C) were interviewed and provided assistance throughout the inspection. They were identified by (b)(6)/(b)(7)(C) respectively. Advanced notification was not provided prior to beginning this inspection.

On 8/30/18, IOI (b)(6)/(b)(7)(C) completed the review of the inventory and required records for the licensee, which consisted of the following:

1. A review of the inventory, including a comparison of the serial numbers to the Acquisition and Disposition (A&D) Record,
2. A review of the A&D Record,
3. A review of the completed ATF Forms 4473, including a comparison of a random sample of the forms to the A&D Record,
4. A review of the ATF Forms 4473, for which a Denial was provided as a NICS response, for the last five years.

Business Profile:

BKB Outdoors, Inc. has conducted business as a dealer of firearms for over eight years. Employer Identification No. (b)(3)(26 USC § 6103) was assigned by the Department of the Treasury, Internal Revenue Service (see Exhibit 1). Sales and Use Tax Permit No. 17606569436 was activated for the current location with the Texas Comptroller of Public Accounts 01/10/10 (see UI# 782075-2017-0192-B1B). The franchise tax account status remains active (see Exhibit 2). A certificate of assumed name to conduct business as 10Ring.com was filed with the Texas Secretary of State on 04/20/12 and remains active for ten years (see UI# 782075-2017-0192-B1B). The business maintains an official internet website at www.10Ring.com and www.facebook.com/10RingHouston (see Exhibits 3 and 4).

BKB Outdoors, Inc. offers new and used handguns and long guns for retail sale to the general public. Director Bryan Brassell is a (b)(6)/(b)(7)(C)

(b)(6)/(b)(7)(C)
(b)(6)/(b)(7)(C) In

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

addition to retail sales, (b)(4)

(b)(4)

(b)(4) During the past year, approximately _____ firearms were acquired and _____ were disposed. (b)(3) (112 Public Law 55 125 Stat 552)

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

(b)(3) (112 Public Law 55 125 Stat 552) The business does not conduct business operations on the South Texas Gun Show Circuit, or utilize off-site storage facilities.

(b)(4)

The business premises operates from a commercial retail center located in a suburban area of Spring and owned by Fairbanks Investments, Inc. (see Exhibit 7). Spring is a census-designated place within the extraterritorial jurisdiction of Houston in Harris County and does not maintain or enforce commercial zoning ordinances. (b)(4)

(b)(4)

(b)(4)

(b)(4) There are no other businesses operating from the licensed premises and the licensee was found to be in compliance with known State and local laws.

Ownership and Control:

BKB Outdoors, Inc. is a domestic, limited liability company. Articles of Incorporation were filed with the Texas Secretary of State on 09/22/00, identifying Bryan A. Brassell, (b)(6)/(b)(7)(C) as

(b)(4), (b)(6)/(b)(7)(C)

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

(b)(4), (b)(6)/(b)(7)(C)

Variance:

A variance was not requested in conjunction with the issuance of this license, or during this compliance inspection.

2 - Recommendation

Violations DIO (or Delegate) Held Warning Conference in Lieu of Revocation.

3 - Inspection History

Date of Inspection: July 28, 2017
Type of Inspection: Compliance
UI#: 782075-2013-0111-B1B
Inspection Results: Violations, Warning Letter, and Recall Inspection
Cited Violations: 27 CFR 478.125(e), 27 CFR 478.21(a), 27 CFR 478.124(c)(1), 27 CFR 478.126a, 18 USC 923(g)(5)(A)

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

From 07/31/18 to 08/30/18, IOI (b)(6)/(b)(7)(C) and (b)(6)/(b)(7)(C) conducted a full and complete gun-to-book inventory of all firearms at the licensed business premises. The physical count disclosed 108 firearms in inventory and [] open dispositions in the A&D Record. The inventory reconciliation disclosed [] firearm, which was not recorded as an acquisition [] firearms, which were not recorded as dispositions (including [] missing from the inventory), and [] firearms, which were recorded as disposed, but failed to identify either the disposition date or the transferee. The licensee was cited under 27 CFR 478.125(e) – failure to correctly record, or correctly record, the acquisition or disposition of [] firearms in the A&D Record (see Violation No. 1, the ATF Form 5030.5, Report of Violations, and the Inventory and A&D Review Worksheet).

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

The A&D Record is maintained in a written, bound book. [] firearms were compared to their identifiers recorded on the ATF Forms 4473, and there were zero discrepancies. There were zero illegal firearms in inventory and zero firearms with obliterated serial numbers in inventory. There were [] losses involving [] firearms recorded during the inspection period (see Exhibit 11).

Store employees are responsible for recording acquisition and disposition entries in the A&D Record. They are responsible for ensuring complete physical inventories are conducted and comparing the A&D Record entries to the ATF Forms 4473.

5 - ATF Forms 4473 – NICS & Other Dispositions

There were [] completed ATF Forms 4473 reviewed during the inspection period, and [] contained errors, or []. The licensee was cited under **27 CFR 478.21(a)** – failure to furnish all the required information on [] forms (see Violation #2 and the ATF Form 5030.5, Report of Violations, the ATF Form 4473 Review Worksheet, and Exhibit 12). The licensee was cited under **27 CFR 478.124(c)(1)** – failure to obtain the transferee’s required information on [] forms (see Violation #3 and the ATF Form 5030.5, Report of Violations, the ATF Form 4473 Review Worksheet, and Exhibit 12). The licensee was cited under **27 CFR 478.124(c)(3)(i)** – failure to identify the transferee by examining the identification document and noting the type of identification used on [] forms (see Violation #4 and the ATF F 5030.5, Report of Violations, the ATF Form 4473 Review Worksheet, and Exhibit 12). The licensee was cited under **27 CFR 478.124(c)(3)(iv)** – failure to record the NICS response completely and correctly on [] forms (see Violation #5 and the ATF Form 5030.5, Report of Violations, the ATF Form 4473 Review Worksheet, and Exhibit 12). The licensee was cited under **27 CFR 478.124(c)(5)** – failure to sign and date [] forms (see Violation #6 and the ATF F 5030.5 Report of Violations, the ATF Form 4473 Review Worksheet, and Exhibit 12). The licensee was cited under **27 CFR 478.102(a)** – failure to complete the NICS background check before returning [] firearms to a consignor (see Violation #7 and the ATF F 5030.5, Report of Violations, and the ATF Form 4473 Review Worksheet). The licensee was cited under **27 CFR 478.124(a)** – failure to record the return of [] firearms to a consignor on the ATF Form 4473 (see Violation #8 and the ATF F 5030.5 Report of Violations, and the ATF Form 4473 Review Worksheet). The licensee was cited under **27 CFR 478.129(b)** – failure to retain the ATF Form 4473 for a period of not less than 20 years from the date of sale or disposition, and failure to retain the ATF Form 4473 for a period of not less than five years from the date of the NICS inquiry for a denied transaction (see Violation #9 and the ATF F 5030.5 Report of Violations, the ATF Form 4473 Review Worksheet, and Exhibit 13).

There were [] NICS transactions completed with a response of “Proceed”, and [] identified as “Open” recorded during the 60-day period preceding the start of the inspection. There were [] NICS transactions completed with a response of “Denied” recorded during the five years preceding the inspection period. The NICS transaction numbers were compared from the ATF Forms 4473 to the FFL Audit Log, and no

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

discrepancies were found. Store employees are responsible for conducting NICS background checks, completing the ATF Forms 4473, and checking them for completeness and accuracy.

Store employees are responsible for conducting NICS background checks and completing the ATF Forms 4473. They are responsible for comparing the forms to the entries in the A&D Record.

6 - Multiple Sales

There were [] multiple sales transactions involving [] handguns and long guns reported to the National Tracing Center during the year preceding this inspection; however, there were [] multiple sales involving [] handguns the licensee failed to report. The licensee was cited under **27 CFR 478.126a** – failure to report the multiple sale of pistols and revolvers (see Violation #10 and the ATF F 5030.5 Report of Violations, the ATF Form 4473 Review Worksheet, and Exhibit 12).

7 - Suspicious/Prohibited Purchasers

There were zero suspicious persons identified during this inspection.

8 - Trace Activity

There were [] successful firearms traces recorded during the year preceding this inspection.

9 - NFA/Importer/Collector/Manufacturer

The licensee does not conduct any NFA, importer, collector, or manufacturer activities.

10 - Referrals

There were zero referrals generated during this inspection.

11 - Other

Bryan Allen Brassell; [(b)(6)/(b)(7)(C)]
Haisten were queried in Open Fox and zero prohibitive information was disclosed. Additionally [] persons identified from the ATF Forms 4473, where a NICS response was not recorded, or the transferee failed to recertify the form, were also queried in Open Fox and zero prohibitive information was disclosed.

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

12 - Closing Actions

On 08/30/18, IOI (b)(6)(b)(7)(C) conducted a closing conference with Mr. Brassell and (b)(6)(b)(7)(C) at the licensed business premises. They were provided with a comprehensive explanation of Federal Firearms Regulations, including required records and reports, conduct of business, licenses, miscellaneous provisions, state laws and local ordinances, and gunsmith activities (see Exhibit 14). They were also provided with the Notice of Selling Firearms After Revocation, Expiration, or Surrender of a License (see Exhibit 15). Mr. Brassell stated he understands his obligations as a responsible person for a federal firearms licensee, and signed the ATF F 5030.5, Report of Violations, and the ATF Form 5300.4 Acknowledgement of Federal Firearms Regulations, and the Notice (see the Report of Violations and Exhibits 14 and 15). He was encouraged to contact the local ATF office with any additional questions.

13 - Violations

1. 27 CFR 478.125(e)

REPEAT OF VIOLATION CITED ON JULY 28, 2017.

Nature of violation: Failure to record, or correctly record, the acquisition or disposition of (b)(3) firearms in the A&D Record.

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

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

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

A total of instances.

Licensee's response: Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow behind them and ensure the implementation of, and adherence to, ATF policies and procedures.

Corrective Action: Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which will be implemented

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

immediately (see Exhibits 16 and 17). The training program and policy enforcement will be managed by employee (b)(6)/(b)(7)(C) who has been designated the ATF Compliance Officer. Complete gun-to-book inventories will be conducted weekly. Mr. Brassell will ensure his employees are trained and following company policies.

See Violation #1 and the ATF F 5030.5, Report of Violations and the ATF Form 4473 Review Worksheet.

2. **27 CFR 478.21(a)**

REPEAT OF VIOLATION CITED ON SEPETMBER 29, 2015 AND JULY 28, 2017.

Nature of violation: Failure to furnish all the required information on the ATF Form 4473.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

A total of [] forms.

Licensee's response: Mr. Brassell stated the errors were his fault and occurred because he delegated the management of the business to his employees. He stated he failed to follow behind them and ensure the implementation of, and adherence to, ATF policies and procedures.

Corrective Action: Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which will be implemented immediately (see Exhibits 16 and 17). The training program and policy enforcement will be managed by employee [(b)(3) (112 Public Law 55 125 Stat 552)] who has been designated the ATF Compliance Officer. ATF Forms 4473 will be completed using the EZ Form system and checked against the A&D Record. Mr. Brassell will ensure his employees are trained and following company policies.

See Violation #2 and the ATF F 5030.5, Report of Violations, the ATF Form 4473 Review Worksheet, and Exhibit 12.

3. **27 CFR 478.124(c)(1)**

REPEAT OF VIOLATION CITED ON SEPTEMBER 29, 2015 AND JULY 28, 2017.

Nature of violation: Failure to obtain the transferee's required information on the ATF Form 4473.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

A total of forms.

Licensee's response: Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow behind them and ensure the implementation of, and adherence to, ATF policies and procedures.

Corrective Action: Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which will be implemented immediately (see Exhibits 16 and 17). The training program and policy enforcement will be managed by employee who has been designated the ATF Compliance Officer. ATF Forms 4473 will be completed using the EZ Form system

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

and checked against the A&D Record. Mr. Brassell will ensure his employees are trained and following company policies.

See Violation #3 and the ATF F 5030.5, Report of Violations, the ATF Form 4473 Review Worksheet, and Exhibit 12.

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

Nature of violation: Failure to identify the transferee by examining the identification document and noting the type of identification used on the ATF Form 4473.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

A total of forms.

Licensee's response: Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow behind them and ensure the implementation of, and adherence to, ATF policies and procedures.

Corrective Action: Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which will be implemented immediately (see Exhibits 16 and 17). The training program and policy enforcement will be managed by employee who has been designated the ATF Compliance Officer. ATF Forms 4473 will be completed using the EZ Form system and checked against the A&D Record. Mr. Brassell will ensure his employees are trained and following company policies.

See Violation #4 and the ATF F 5030.5, Report of Violations, the ATF Form 4473 Review Worksheet, and Exhibit 12.

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

Nature of violation: Failure to completely and accurately record the NICS response on the ATF Form 4473.

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

A total of forms.

Licensee's response: Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow behind them and ensure the implementation of, and adherence to, ATF policies and procedures.

Corrective Action: Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which will be implemented immediately (see Exhibits 16 and 17). The training program and policy enforcement will be managed by employee who has been designated the ATF Compliance Officer. ATF Forms 4473 will be completed using the EZ Form system and checked against the A&D Record. Mr. Brassell will ensure his employees are trained and following company policies.

See Violation #5 and the ATF F 5030.5, Report of Violations, the ATF Form 4473 Review Worksheet, and Exhibit 12.

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

Nature of violation: Failure to sign and date the ATF Form 4473.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

A total of forms.

Licensee's response: Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow behind them and ensure the implementation of, and adherence to, ATF policies and procedures.

Corrective Action: Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which will be implemented immediately (see Exhibits 16 and 17). The training program and policy enforcement will be managed by employee (b)(6)/(b)(7)(C) who has been designated the ATF Compliance Officer. ATF Forms 4473 will be completed using the EZ Form system and checked against the A&D Record. Mr. Brassell will ensure his employees are trained and following company policies.

See Violation #6 and the ATF F 5030.5, Report of Violations, the ATF Form 4473 Review Worksheet, and Exhibit 12.

7. **27 CFR 478.102(a)**

Nature of violation: Failure to complete the NICS background check before returning two firearms to a consignor during one transfer.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

instance.

Licensee's response: Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow behind them and ensure the implementation of, and adherence to, ATF policies and procedures.

Corrective Action: Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which will be implemented immediately (see Exhibits 16 and 17). The training program and policy enforcement will be managed by employee (b)(6)/(b)(7)(C) who has been designated the ATF

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

Compliance Officer. Consigned firearms acquisitions will be recorded in a separate A&D Record. ATF Forms 4473 will be completed using the EZ Form system and checked against the Consigned Firearms A&D Record. Mr. Brassell will ensure his employees are trained and following company policies.

See Violation #7 and the ATF F 5030.5, Report of Violations and the ATF Form 4473 Review Worksheet.

8. **27 CFR 478.124(a)**

Nature of violation: Failure to record the return of [redacted] firearms to a consignor on the ATF Form 4473.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

[redacted] instance.

Licensee's response: Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow behind them and ensure the implementation of, and adherence to, ATF policies and procedures.

Corrective action: Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which will be implemented immediately (see Exhibits 16 and 17). The training program and policy enforcement will be managed by employee [redacted], who has been designated the ATF Compliance Officer. Consigned firearms acquisitions will be recorded in a separate A&D Record. ATF Forms 4473 will be completed using the EZ Form system and checked against the Consigned Firearms A&D Record. Mr. Brassell will ensure his employees are trained and following company policies.

See Violation #8 and the ATF F 5030.5, Report of Violations and the ATF Form 4473 Review Worksheet.

9. **27 CFR 478.129(b)**

Nature of violation: Failure to retain the ATF Form 4473 for a period of not less than 20 years from the date of sale or disposition, and failure to retain the ATF Form 4473 for a period of not less than five years from the date of the NICS inquiry for a denied transaction.

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

A total of [] instances.

Licensee's response: Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow behind them and ensure the implementation of, and adherence to, ATF policies and procedures.

Corrective action: Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which will be implemented immediately (see Exhibits 16 and 17). The training program and policy enforcement will be managed by employee [] who has been designated the ATF Compliance Officer. ATF Forms 4473 will be completed using the EZ Form system and checked against the A&D Record. All completed ATF Forms 4473, which have received a response of "Denied" on the NICS background check, will be marked "DENIED" in red at the top of the form and filed in a separate folder. Mr. Brassell will ensure his employees are trained and following company policies.

See Violation #9 and the ATF F 5030.5 Report of Violations, the ATF Form 4473 Review Worksheet, and Exhibit 13 and 12, respectively.

10. **27 CFR 478.126a**

REPEAT OF VIOLATION CITED ON JULY 28, 2017

Nature of violation: Failure to report the multiple sales of pistols and revolvers.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc. UI#: 782075-2018-0356-B1B
Trade Name: 10Ring.com FFL#: 5-76-201-01-9D-02612

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)/(b)(7)(C)

A total of [] multiple sales involving [] handguns.

Licensee's response: Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow behind them and ensure the implementation of, and adherence to, ATF policies and procedures.

Corrective Action: Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which will be implemented immediately (see Exhibits 16 and 17). The training program and policy enforcement will be managed by employee [] who has been designated the ATF Compliance Officer. ATF Forms 4473 will be completed using the EZ Form system and checked against the A&D Record. The Reports of Multiple Sales of Pistols and Revolvers were filed with the National Tracing Center on 08/02/18 and this was verified by IOI []. All future Multiple Sales Reports will be timely filed. Mr. Brassell will ensure his employees are trained and following company policies.

See Violation #10 and the ATF F 5030.5, Report of Violations, the ATF Form 4473 Review Worksheet, and Exhibit 12.

X

(b)(6)/(b)(7)(C)

Industry Operations Investigator

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612

Index of Worksheets and Exhibits

1. Report of Violations
2. Firearms Worksheets Workbook
3. Exhibit 1 – Department of the Treasury, Internal Revenue Service Federal Employee Identification Number
6. Exhibit 2 – Texas Comptroller of Public Accounts Franchise Tax Account Status and List of Officers and Directors
7. Exhibit 3 – Official Internet Website of 10Ring.com
8. Exhibit 4 – Official Internet Facebook Website of 10Ring.com
9. Exhibit 5 – BKB Outdoors, Inc., doing business as 10Ring.com, Federal Firearms License No. 5-TX-201-29-0B-01491, issued 01/07/11 and expires 02/01/20
10. **(b)(6)/(b)(7)(C)**
11. Exhibit 7 – Harris County Appraisal District Real Property Tax Record
12. Exhibit 8 – Lease Agreement Extension
13. Exhibit 9 – Statement of Distribution of Stock Shares
14. Exhibit 10 – Texas Secretary of State Business Organizations Inquiry of Bryan Brassell
15. Exhibit 11 – Federal Firearms License Firearms Inventory Theft/Loss Report
16. Exhibit 12 – Copies of ATF Forms 4473
17. Exhibit 13 – Excerpt from FFL Audit Log
18. Exhibit 14 – Acknowledgement of Federal Firearms Regulations
19. Exhibit 15 – Notice of Selling Firearms After Revocation, Expiration, or Surrender of a Federal Firearms License
20. Exhibit 16 – New Employee Training Checklist
23. Exhibit 17 – Store Policies

FIREARMS INSPECTION REPORT

Name: BKB Outdoors, Inc.
Trade Name: 10Ring.com

UI#: 782075-2018-0356-B1B
FFL#: 5-76-201-01-9D-02612



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
5825 N. Sam Houston Pkwy. W., Ste. 300
Houston, Texas 77086

www.atf.gov

782075:TI [REDACTED]
5373

WARNING CONFERENCE

BKB Outdoors Inc.
dba 10Ring.com
Attn: Mr. Bryan Brassell, Director
11607 Canyon Woods Drive
Tomball, Texas 77377

Re: Federal Firearms License Number: 5-76-201-01-9D-02612

Dear Mr. Brassell:

As a result of a recent compliance inspection conducted by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) at your firearms business located at 12779 Jones Road, Suite 103B, Houston, Texas 77070 from July 31, 2018 through August 30, 2018, 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, ATF 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 in the Houston Field Office located at 5825 N. Sam Houston Parkway West, Suite 300, Houston, Texas 77086, on November 27, 2018 at 10:00 am. 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 and any compliance plan you have developed to ensure these violations do not recur.**

Also, you are hereby notified that, pursuant to 18 U.S.C. § 930(a), no person may bring a firearm or other dangerous weapon into an ATF office. Possession of a firearm or other dangerous weapon in an ATF office may result in a fine of \$100,000 or imprisonment for not more than 1 year or both.

BKB Outdoors Inc.
dba 10Ring.com

Federal Firearms License Number: 5-76-201-01-9D-02612

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 Industry Operations Investigator (b)(6)/(b)(7)(C) at (b)(6)/(b)(7)(C) 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,

(b)(6)/(b)(7)(C)

Tanarra James
Director, Industry Operations
Houston Field Division

Attachment



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Houston Field Division

5825 N Sam Houston Pkwy W #300
Houston, Texas 77086
www.atf.gov

782075 (b)(6)/(b)(7)(C)
5370

December 18, 2018

Bryan Brassell
BKB Outdoors, Inc. dba 10Ring.com
11607 Canyon Woods Drive
Tomball, Texas 77377

Re: Federal Firearms License Number: 5-76-201-01-9D-02612

Dear Mr. Brassell:

This letter is a follow-up to the warning conference held with you on December 4, 2018. During this conference, the repeated violations cited during the inspection conducted from July 31, 2018, through August 30, 2018, and the necessary corrective action to prevent the violations from reoccurring were discussed. In attendance at this meeting, representing the ATF Houston Field Division, were Director of Industry Operations Tanarra James and Industry Operations Investigator (b)(6)/(b)(7)(C). In attendance, representing the licensee, at this meeting was Bryan Brassell and (b)(6)/(b)(7)(C).

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. With respect to the violations cited below, we are providing a summary of your response to each violation:

- (1.) **Violation of 27 CFR 478.125(e):** Failure to record, or correctly record, the acquisition or disposition of () firearms in the A&D Record.

Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow up and ensure the implementation of, and adherence to, ATF policies and procedures. He stated he understands the severity of these violations and that they would not happen again. Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which have

BKB Outdoors, Inc. dba 10Ring.com
5-76-201-01-9D-02612

been implemented. The training program and policy enforcement will be managed by (b)(6)/(b)(7)(C) who has been designated the General Manager (GM) of Compliance. Mr. Brassell stated dispositions will be entered into the A&D Record before firearms leave the store and complete gun-to-book inventories will be conducted weekly. The ATF 4473 E-Form will also be used to reduce the potential for errors when entering information into the A&D Record. DIO James suggested a second employee double-check the A&D Record entries before firearms leave the store to ensure complete and accurate entries.

(2.) Violation of 27 CFR 478.21(a): Failure to furnish all the required information on (b)(6)/(b)(7)(C) ATF Forms 4473.

Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow up and ensure the implementation of, and adherence to, ATF policies and procedures. He stated he understands the severity of these violations and that they would not happen again. Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which have been implemented. The training program and policy enforcement will be managed by (b)(6)/(b)(7)(C) who has been designated the GM of Compliance. Mr. Brassell stated the ATF 4473 E-Form will be used to reduce the potential for errors and the Forms will be rechecked weekly for completeness and accuracy. DIO James suggested a second employee double-check the ATF Form 4473 and enter his or her name in Box 31 and the employee completing the weekly check initial the top of the first page of the Form.

(3.) Violation of 27 CFR 478.124(c)(1): Failure to obtain the transferee's required information on (b)(6)/(b)(7)(C) ATF Forms 4473.

Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow up and ensure the implementation of, and adherence to, ATF policies and procedures. He stated he understands the severity of these violations and that they would not happen again. Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which have been implemented. The training program and policy enforcement will be managed by (b)(6)/(b)(7)(C) who has been designated the GM of Compliance. Mr. Brassell stated the ATF 4473 E-Form will be used to reduce the potential for errors and the Forms will be rechecked weekly for completeness and accuracy. DIO James reminded Mr. Brassell that the information on the forms must be checked against the government identification document before transactions are finalized. DIO James suggested a second employee double-check the ATF Form 4473 and enter his or her name in Box 31 and the employee completing the weekly check initial the top of the first page of the Form.

BKB Outdoors, Inc. dba 10Ring.com
5-76-201-01-9D-02612

- (4.) **Violation of 27 CFR 478.124(c)(3)(i):** Failure to identify the transferee by examining the identification document and noting the type of identification used on ATF Forms 4473.

Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow up and ensure the implementation of, and adherence to, ATF policies and procedures. He stated he understands the severity of these violations and that they would not happen again. Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which have been implemented. The training program and policy enforcement will be managed by (b)(6)/(b)(7)(C) who has been designated the GM of Compliance. Mr. Brassell stated the ATF 4473 E-Form will be used to reduce the potential for errors and the Forms will be rechecked weekly for completeness and accuracy. DIO James suggested a second employee double-check the ATF Form 4473 and enter his or her name in Box 31 and the employee completing the weekly check initial the top of the first page of the Form.

- (5.) **Violation of 27 CFR 478.124(c)(3)(iv):** Failure to completely and accurately record the NICS response on ATF Forms 4473.

Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow up and ensure the implementation of, and adherence to, ATF policies and procedures. He stated he understands the severity of these violations and that they would not happen again. Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which have been implemented. The training program and policy enforcement will be managed by (b)(6)/(b)(7)(C) who has been designated the GM of Compliance. Mr. Brassell stated the ATF 4473 E-Form will be used to reduce the potential for errors and the Forms will be rechecked weekly for completeness and accuracy. DIO James suggested printing the E-NICS response and attaching it to the ATF Form 4473. DIO James also suggested a second employee double-check the ATF Form 4473 and enter his or her name in Box 31 and the employee completing the weekly check initial the top of the first page of the Form.

- (6.) **Violation of 27 CFR 478.124(c)(5):** Failure to sign and date the ATF Form 4473 on Forms.

Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow up and ensure the implementation of, and adherence to, ATF policies and procedures. He stated he understands the severity of these violations and that they would not happen again. Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which have been implemented. The training program and policy enforcement will be managed by (b)(6)/(b)(7)(C) who has been designated the GM of Compliance. Mr. Brassell stated the ATF 4473 E-Form will

BKB Outdoors, Inc. dba 10Ring.com
5-76-201-01-9D-02612

be used to reduce the potential for errors and the Forms will be rechecked weekly for completeness and accuracy. DIO James suggested a second employee double-check the ATF Form 4473 and enter his or her name in Box 31 and the employee completing the weekly check initial the top of the first page of the Form.

- (7.) **Violation of 27 CFR 478.102(a):** Failure to complete the NICS background check before returning [] firearms to a consignor in [] instance.

Mr. Brassell stated he was not aware of this regulation, but the error was his fault and compounded by the fact that he delegated management of the business to his employees. He stated he understands the severity of the violation and that it would not happen again. Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which have been implemented. The training program and policy enforcement will be managed by (b)(6)/(b)(7)(C) who has been designated the GM of Compliance.

- (8.) **Violation of 27 CFR 478.124(a):** Failure to record the return of [] firearms to a consignor on the ATF Form 4473 in [] instance.

Mr. Brassell stated he was not aware of this regulation, but the error was his fault and compounded by the fact that he delegated management of the business to his employees. He stated he understands the severity of the violation and that it would not happen again. Mr. Brassell has designed an employee training program and drafted new policies to strengthen internal controls, which have been implemented. The training program and policy enforcement will be managed by (b)(6)/(b)(7)(C) who has been designated the GM of Compliance.

- (9.) **Violation of 27 CFR 478.129(b):** Failure to retain the ATF Form 4473 for a period of not less than 20 years from the date of sale or disposition, and failure to retain the ATF Form 4473 for a period of not less than five years from the date of the NICS inquiry for a denied transaction in [] instances.

Mr. Brassell stated the error was his fault and occurred because the Form was accidentally placed with other paperwork and was probably discarded. He stated he understands the severity of the violation and that it would not happen again. DIO James suggested retention of the Forms in a holding file until completion of the weekly review.

- (10.) **Violation of 27 CFR 478.126a:** Failure to report the multiple sales of pistols and revolvers in [] instances involving [] handguns.

Mr. Brassell stated the errors were his fault and occurred because he delegated management of the business to his employees. He stated he failed to follow up and ensure the implementation of, and adherence to, ATF policies and procedures. He stated he understands the severity of these violations and that they would not happen again. Mr. Brassell has designed an employee

BKB Outdoors, Inc. dba 10Ring.com
5-76-201-01-9D-02612

training program and drafted new policies to strengthen internal controls, which have been implemented. The training program and policy enforcement will be managed by **(b)(6)/(b)(7)(C)** who has been designated the GM of Compliance. Mr. Brassell stated the ATF 4473 E-Form will be used to reduce the potential for errors and that the system automatically creates a multiple sales form when two or more firearms are transferred. DIO James suggested a second employee double-check the ATF Form 4473 and enter his or her name in Box 31 and the employee completing the weekly check initial the top of the first page of 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 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,

(b)(6)/(b)(7)(C)

Tanarra James
Director, Industry Operations
Houston Field Division