

### Report of Firearms Compliance Inspection

10 RING SPORTS & PAWN LLC's FCI  
FCI-9955  
05/28/2019 11:08 AM  
IO (b)(6), (b)(7)(C) , Savannah (IO) Satellite Office

**LICENSEE INFORMATION**

Licensee Name	RDS Key	License/Permit Number	License Type
10 RING SPORTS & PAWN LLC	1-58-11867	1-58-177-02-2C-11867	02 - Pawnbroker License
Business Type Limited Liability Company (LLC)			

**Premises Address**

Premises Ownership Type Owned  
  
Premises Location Type Store Front

**Mailing Address**

Address  
P O BOX 91  
Unit N/A  
LEESBURG, Georgia 31763  
County United States

Address  
121 WALNUT AVE S  
Unit N/A  
LEESBURG, Georgia 31763  
LEE County United States

Phone Type	Phone Number	Remarks
Business	+1 229-759-2701	
Fax	+1 229-759-2702	

Email Address	Email Remarks
(b)(6), (b)(7)(C)	

**RECOMMENDATIONS**

Final Decision  
Warning Letter

Area Supervisor (b)(6), (b)(7)(C) Recommendation  
Warning Letter

Details  
I concur with the recommendation of a Warning Letter. The Warning Letter will be issued to the licensee via email on 05/22/19.

Industry Operations Investigator (b)(6), (b)(7)(C) Recommendation  
Warning Letter

Details  
A recommendation of Warning Letter and No Recall Inspection is recommended. The licensee failed to verify the transferee's state of residence by accepting temporary military orders vs. Permanent Change of Station orders, in one instance. (b)(3) - 112 Public Law 55 125 Stat 552 (b)(6) (b)(7)(C), a military member on temporary orders to Albany, GA. The licensee was instructed on the proper completion and execution of the ATF Form 4473 and ensured future compliance.

**Inspection Findings**

**Transfer of Firearm**

Transfer of a Rifle / Shotgun to a resident of another State that violates State law.

**ELIGIBILITY VERIFICATION**

**Business Information Verification**

Licensee Name	Business Type	Is the business valid?
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Additional Findings

The business is actively registered with the Georgia Secretary of State Corporations Division, reference Control Number 15106033.

Attachment(s):

Georgia Secretary of State Corporate Registration.pdf

**Property Ownership Verification**

Premises Ownership Type	Premises Location Type	Has the property ownership been verified?
Owned	Store Front	Yes

Address

121 WALNUT AVE S  
 Unit N/A  
 LEESBURG, Georgia 31763  
 LEE County United States

Additional Findings

According to the Lee County Tax Assessor's website, the property is owned by Managing Member, Mark Braber.

Attachment(s):

Property Ownership Verification qPublic.pdf

**Zoning Information Verification**

Is the proposed business activity in compliance with zoning?

Yes

Additional Findings

The clerk for the City Manager of Leesburg, Gerogia, (b)(6), (b)(7)(C) was contacted on 04/30/19 and verified that the licensee is in compliance with all local laws/zoning ordinances.

**Contact Information**

Name: (b)(6), (b)(7)(C) Date Contacted: 04/30/2019

Organization: City Hall, Leesburg, Georgia

Job Title: Clerk for City Manager

Phone Type	Phone Number	Remarks
Business	(b)(6), (b)(7)(C)	8am-5pm

Attachment(s):

City of Leesburg Business License.pdf

**APPOINTMENT DETAILS**

Interview Date

05/16/2019

Address

121 WALNUT AVE S Unit N/A , LEESBURG, Georgia 31763

**Responsible Attendee(s)**

Kimberly Winborne Graber

Marc James Graber

**Non-Responsible Attendee(s)**

No items

**RESPONSIBLE PERSON(S)**

**Kimberly Winborne Graber**

Name	Gender	Race	Ethnicity
Ms. Kimberly Winborne Graber	Male	White	Not Hispanic or Not Latino
Date of Birth	SSN	Job Title	
(b)(6), (b)(7)(C)		MANAGING MEMBER	

**Physical Identifiers**

Height (b)(6), (b)(7)(C) Weight (b)(6), (b)(7)(C) Hair Color (b)(6), (b)(7)(C) Eye Color (b)(6), (b)(7)(C)

**Place of Birth**

Country USA City

**Home Address**

(b)(6), (b)(7)(C)

**Additional Names**

**Citizenship**

United States

ID Type	Country	State	ID Number
Driver's License	United States	Georgia	(b)(6), (b)(7)(C)

Phone Type	Phone Number	Remarks
Mobile	(b)(6), (b)(7)(C)	

Email Address	Email Remarks
(b)(6), (b)(7)(C)	

**Criminal History Check**

Date Criminal History Check Conducted 04/17/2019

Criminal History Check Comments The NCIC query disclosed no prohibiting information.

**Marc James Graber**

Name	Gender	Race	Ethnicity
Mr. Marc James Graber	Female	White	Not Hispanic or Not Latino
Date of Birth	SSN	Job Title	
(b)(6), (b)(7)(C)		MANAGING MEMBER	

**Physical Identifiers**

Height (b)(6), (b)(7)(C) Weight (b)(6), (b)(7)(C) Hair Color (b)(6), (b)(7)(C) Eye Color (b)(6), (b)(7)(C)

**Place of Birth**

Country USA City

**Home Address**

(b)(6), (b)(7)(C)

(b)(6), (b)(7)(C)

**Additional Names**

**Citizenship**

United States

ID Type	Country	State	ID Number
Driver's License	United States	Georgia	(b)(6), (b)(7)(C)

Phone Type	Phone Number	Remarks
Business	(b)(6), (b)(7)(C)	

Email Address	Email Remarks
(b)(6), (b)(7)(C)	

**Criminal History Check**

Date Criminal History Check Conducted  
04/17/2019

Criminal History Check Comments  
The NCIC query disclosed no prohibiting information.

**INTERVIEW QUESTIONNAIRE**

What is the proposed business activity?  
The licensee conducts business in the retail sale and pawn of new and used firearms, including gunsmithing activity. The licensee does not utilize the internet for the firearms business and does not conduct business at gun shows.

Do they need an additional license or permit?  
No

Who are their primary suppliers?  
(b)(4)

**Business Activities**

- Pawnbroker
- Retail
- Gunsmith

- Selected Operational Security Measures
- Controlled Access to ATF Recordkeeping
  - Controlled Access to Keys
  - Current & Active Security Plan
  - Formal Employee Training
  - Suspicious persons/activities reporting protocols

**PREMISES INFORMATION**

Inspection Area Description  
The business is a storefront located in a commercially zoned area of Leesburg, GA.

Primary Activity  
Retail

**GPS Coordinates**

Latitude  
31.43515N

Longitude  
084.10205W

Selected Physical Security Measures

(b)(4)

**ONSITE SUMMARY**

Total # of ATF F 4473 Reviewed

(b)(3)

Total # of Open Dispositions in A & D Record

(b)(3)

Total # of Firearms in Inventory

95

Total # of Firearms Missing after Reconciliation

0

Total # of Acquisitions in the Last 12 Months

(b)(4)

Total # of Dispositions in the Last 12 Months

(b)(4)

Attachment(s)

Report of Violations.pdf

Report of Violations.pdf

Report of Violations.pdf

Licensee Response to Violations Report.pdf

Licensee Response to Violations Report.pdf

**REPORT OF VIOLATIONS**

Regulation	Corrective Actions	Instance Details
1 27 CFR 478.99(a): Unlawful sale or delivery of a handgun to an out of state resident and/or transfer of a long gun in violation of state law  Number of Instances: 1	The licensee was instructed to verify state residence of military members via Permanent Change of Station (PCS) orders effectively immediately. Cease and desist all firearm transfers (including lower receivers) other than a rifle or shotgun, to residents of another state.	(b)(3) - 112 Public Law 55 125 Stat 552 (b)(6) (b)(7)(C)
2 27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473  Number of Instances: 2	Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions. Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified. Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.	(b)(3) - 112 Public Law 55 125 Stat 552 (b)(6) (b)(7)(C)

**LICENSEE RESPONSE REPORT**

Regulation	Corrective Actions	Licensee Response	Status Details
1 27 CFR 478.99(a): Unlawful sale or delivery of a handgun to an out of state resident and/or transfer of a long gun in violation of state law  Number of Instances: 1	The licensee was instructed to verify state residence of military members via Permanent Change of Station (PCS) orders effectively immediately. Cease and desist all firearm transfers (including lower receivers) other than a rifle or shotgun, to residents of another state.	Licensee ensured future compliance.	Status Licensee Notified  Verified Method In Person  Date Licensee Notified 05/17/2019
2 27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473  Number of Instances: 2	Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions. Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified. Execute and retain a complete and accurate ATF Form 4473 on	Licensee ensured future compliance.	Status Licensee Notified  Verified Method In Person  Date Licensee Notified

all future firearm transactions.

05/17/2019

**CLOSING CONFERENCE**

Closing Conference Date

05/17/2019

Attachment(s)

**Attendee(s)**

Marc James Graber

**WARNING LETTER**

Delivery Method

Email

Type	Email
Marc James Graber Email	(b)(6), (b)(7)(C)

**EXHIBITS**

*Inspection*

Category	Attachment Name
Correspondence	Spartan Notification RE: 1-58-11867 Inspection Results
WarningLetterReturnEmail	10RingWLResponse.pdf
Correspondence	
Correspondence	Action required concerning your Federal Firearms License
WarningLetter	Warning Letter.pdf
LicenseeResponseToViolationsPDF	Licensee Response to Violations Report.pdf
ReturnedSignedROV	Amended ROV 10 Ring .pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
ViolationsPDF	Report of Violations.pdf
ZoningVerification	City of Leesburg Business License.pdf
Correspondence	Information Concerning Your Federal License/Permit
ClosingConferenceSummary	Acknowledgment of Regulations.pdf
LicenseeResponseToViolationsPDF	Licensee Response to Violations Report.pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
ViolationsPDF	Report of Violations.pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
ViolationsPDF	Report of Violations.pdf
PropertyOwnershipVerification	Property Ownership Verification qPublic.pdf
BusinessVerification	Georgia Secretary of State Corporate Registration.pdf

FFL: 10 RING SPORTS & PAWN LLC  
 Inspection: FCI-9955  
 Date Generated: 5/21/2019  
 RDS Key: 1-58-11867  
 Lead Industry Operations Investigator: (b)(6), (b)(7)(C)

Regulation	Corrective Action(s)	Instance Details	Date Amended
1 27 CFR 478.99(a): Unlawful sale or delivery of a handgun to an out of state resident and/or transfer of a long gun in violation of state law  Number of Instances: 1	Cease and desist all firearm transfers (including lower receivers) other than a rifle or shotgun, to residents of another state.  The licensee was instructed to verify state residence of military members via Permanent Change of Station (PCS) orders effectively immediately.	(b)(3) - 112 Public Law 55 125 Stat 552 (b)(6) (b)(7)(C)	05/21/2019
2 27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473  Number of Instances: 1	Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions. Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified. Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.	(b)(3) - 112 Public Law 55 125 Stat 552 (b)(6) (b)(7)(C)	05/21/2019

My signature below certifies that I acknowledge I have reviewed the above information. I understand that this is only a general overview of the violations and that I will be responsible for familiarizing myself with all of the laws and regulations governing my licensed/permitted business.

\_\_\_\_\_  
 Signature

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Printed Name

**Licensee Response to Violations Report**

FFL: 10 RING SPORTS & PAWN LLC

Inspection: FCI-9955

Date Generated: 5/22/2019

RDS Key: 1-58-11867

Lead Industry Operations Investigator: (b)(6), (b)(7)(C)

Regulation	Corrective Action(s)	Licensee Response
1 27 CFR 478.99(a): Unlawful sale or delivery of a handgun to an out of state resident and/or transfer of a long gun in violation of state law  Number of Instances: 0	Cease and desist all firearm transfers (including lower receivers) other than a rifle or shotgun, to residents of another state.  The licensee was instructed to verify state residence of military members via Permanent Change of Station (PCS) orders effectively immediately.	Licensee ensured future compliance.
2 27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473  Number of Instances: 0	Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions.  Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified.  Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.	Licensee ensured future compliance.



May 22, 2019

WARNING LETTER

10 RING SPORTS & PAWN LLC

P O BOX 91  
LEESBURG, Georgia 31763

Re: Federal Firearms License Number: 1-58-11867.

10 RING SPORTS & PAWN LLC,

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 121 WALNUT AVE S Unit N/A , LEESBURG, Georgia 31763 on 5/16/2019 through 5/17/2019 , 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.

All violations were fully explained to you by ATF Industry Operations Investigator (b)(6), (b)(7)(C) . You indicated that you understood the requirements of the firearms laws and regulations as a licensee. You further indicated that corrective actions would be taken to eliminate future violations.

The records you are required to maintain and the business operations you conduct are important to law enforcement in our continuing efforts to reduce violent crime and protect the public. It is essential that you comply with all Federal laws and regulations that govern your firearms business. ATF appreciates the efforts you and other industry members make in this area, and we look forward to continuing to work with you in that regard.

You are reminded that retention of your Federal Firearms License is conditional upon compliance with Federal laws and regulations. Because the violations cited in this most recent inspection were fully explained to you and you stated you understood your compliance responsibilities as a licensee, any future violations, either repeat or otherwise, could be viewed as willful and may result in the revocation of your license. Please ensure that future compliance is achieved.

Should you have any questions regarding this matter, please contact Industry Operations Investigator (b)(6), (b)(7)(C) .

Sincerely,  
(b)(6), (b)(7)(C)  
Area Supervisor  
Macon II (IO) Field Office

Attachment