

## Assignment and Report

<b>1. OPERATING NAME AND ADDRESS</b> (INCLUDE ZIP CODE AND COUNTY) CCS GUNS LLC 2216 S RAINBOW BLVD LAS VEGAS, NV 89146, CLARK		<b>2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.)</b> 786090-2014-0300-B1B		
		<b>3. PERMIT/LICENSE NUMBER</b> 988003012L35437	<b>4a. TARGET DATE</b> 8/31/2015	<b>4b. TARGET HOURS</b>
		<b>5. REQUESTED BY (SIGNATURE, TITLE AND DATE)</b>		
<b>6. ATF OFFICER(S) ASSIGNED</b> (b) (6) Assigned Investigator (b) (6) Lead Investigator (b) (6) Assigned Investigator (b) (6) - Assigned Investigator				
<b>7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)</b> (b) (6) Area Supervisor, 06/12/2015				
<b>8. PURPOSE/SPECIAL INSTRUCTIONS</b> CONDUCT A RECALL INSPECTION. NOTE: THE LICENSEE HAS BEEN REQUIRED TO ATTEND MULTIPLE WARNING CONFERENCES. CONDUCT A THOROUGH REVIEW OF THE INSPECTION HISTORY PRIOR TO INITIATING THE ASSIGNMENT. ALSO, OBTAIN EIN INFORMATION.				
<b>9. INSPECTION RESULTS</b>		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		<b>10. TRAVEL EXPENSES (OPTIONAL)</b>
NO. OF VIOLATIONS	11	NO. OF REFERRALS	(b) (3) - Public Law 112-55 (25 Stat. 552)	2111 - PER DIEM
NO. OF TECS CHECKS	32	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.
<b>11. ATF OFFICER'S RECOMMENDATION</b> Submitted by (b) (6) - Industry Operations Investigator  Submitted on: 10/21/2015  Viols and Revocation / Denial of Renewal App				
<b>12. TIME ACCOUNTING DATA</b>				
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b) (6)		
JUL 2015		8.00		
AUG 2015		4.00		
ATF OFFICER'S SUBTOTAL		12.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b) (6)		
JUL 2015		83.00		
AUG 2015		83.50		
SEP 2015		40.00		
OCT 2015		1.50		
DEC 2015		3.00		
JAN 2016		9.00		
ATF OFFICER'S SUBTOTAL		220.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b) (6)		
JUL 2015		12.50		
ATF OFFICER'S SUBTOTAL		12.50	ATF OFFICER'S SIGNATURE	

## Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) CCS GUNS LLC 2216 S RAINBOW BLVD LAS VEGAS, NV 89146, CLARK	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 786090-2014-0300-B1B		
	3. PERMIT/LICENSE NUMBER 988003012L35437	4a. TARGET DATE 8/31/2015	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

12. TIME ACCOUNTING DATA	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b) (6)
AUG 2015	3.00
ATF OFFICER'S SUBTOTAL	3.00
ATF OFFICER'S SIGNATURE	
TOTAL HOURS	247.50

13. REVIEW AND ROUTING
REVIEW COMMENTS AND RECOMMENDATION

Viols and Revocation / Denial of Renewal App

<input checked="" type="checkbox"/> REVIEWED	<input checked="" type="checkbox"/> CONCUR	<input type="checkbox"/> SEE COMMENTS	<input type="checkbox"/> FINAL DISPOSITION
SIGNATURE AND TITLE (b) (6) Area Supervisor		REVIEW DATE 10/16/2015	

REVIEW COMMENTS AND RECOMMENDATION

DAD Graham declined this case into the Monitored Case Program as a revocation. He instructed the SFFD to hold a second DIO led Warning Conference with this licensee instead.

Viols DIO (or Delegate) Held WC ILO Revocation

<input checked="" type="checkbox"/> REVIEWED	<input type="checkbox"/> CONCUR	<input checked="" type="checkbox"/> SEE COMMENTS	<input checked="" type="checkbox"/> FINAL DISPOSITION
SIGNATURE AND TITLE RMROOT - Director, Industry Operations		REVIEW DATE 10/19/2015	

ROUTING SEQUENCE AND DATE

- ☐ 1. \_\_\_\_\_
- ☐ 2. \_\_\_\_\_
- ☐ 3. \_\_\_\_\_
- ☐ 4. \_\_\_\_\_

CONTROL FILE POSTED DATE \_\_\_\_\_

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 CCS GUNS LLC	Street Address 2216 S RAINBOW BLVD	City LAS VEGAS	State NV	Zip Code 89146-	County CLARK	Page 1 of 7 Pages
License/Permit/Registry Number <i>(If any)</i> 988003012L35437		Expiration Date 11/1/2015		Date(s) or Period of Inspection 07/14/2015 through 08/26/2015		

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:  
1-Licensee failed to ensure accurate completion of all sections of ATF Form 4473 prior to transfer of a firearm to an individual. Of the 101 ATF Forms 4473 reviewed for the inspection period:  

D(3), Public Law 112-56 (126 Stat. 562)

Citation: 27 CFR 478.21(a)

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

Corrective Action to be Taken: Licensee was reminded to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of the firearm to an individual.  
(If not corrected immediately)

# Report of Violations

## Instructions

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License/Permit/Registry Number <i>(If any)</i> 988003012L35437		Expiration Date 11/1/2015		Date(s) or Period of Inspection 07/14/2015 through 08/26/2015		

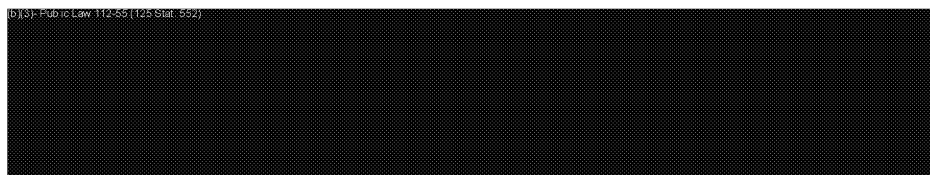
## Inspection Results

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

Number: 2

### Nature of Violation:

2-Licensee failed to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the [REDACTED] TF Forms 4473 reviewed for the inspection period:



Citation: 27 CFR 478.124(c)(1)

Number: 3

### Nature of Violation:

3-Licensee failed to ensure completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the [REDACTED] ATF Forms 4473 reviewed for the inspection period: On [REDACTED] block 20a (Issuing Authority/Type of Identification) was incorrect/incomplete.

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)*

Licensee was reminded to ensure completion of all sections of the ATF Form 4473 prior to transfer of the firearm to an individual.

### Date Corrections to be Made:

*(If not corrected immediately)*

### Corrective Action to be Taken:

*(If not corrected immediately)*

Licensee was reminded to ensure completion of all sections of the ATF Form 4473 prior to transfer of the firearm to the individual.

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

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License/Permit/Registry Number (If any) 988003012L35437		Expiration Date 11/1/2015	Date(s) or Period of Inspection 07/14/2015 through 08/26/2015			

Inspection Results

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

Number: 4

Nature of Violation:  
4-Licensee failed to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the (b)(3)-Public Law 112-56 (125 Stat. 552) TF Forms 4473 reviewed for the inspection period:  
  
•On (b)(3)-Public Law 112-56 (125 Stat. 552) block 21c (Reponse initially provided by NICS/State) was blank;  
•On (b)(3)-Public Law 112-56 (125 Stat. 552) block 21d (If initial response was delayed) was incomplete.

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)

Licensee was reminded to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of the firearm to an individual.

Number: 5

Nature of Violation:  
5-Licensee failed to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the (b)(3)-Public Law 112-56 (125 Stat. 552) ATF Forms 4473 reviewed for the inspection period:  

(b)(3)-Public Law 112-56 (125 Stat. 552)

Citation:

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

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

Licensee was reminded to ensure completion of all sections of the ATF Form 4473 prior to transfer of the firearm to the individual. On August 25, 2015, licensee photocopied the incorrect pages, made corrections to the copies and attached the corrected pages to the original ATF Form 4473.

235

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ATF E-Form 5030 5  
Revised April 2005

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

Instructions

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Name of Proprietor CCS GUNS LLC	Street Address 2216 S RAINBOW BLVD	City LAS VEGAS	State NV	Zip Code 89146-	County CLARK	Page 4 of 7 Pages
License/Permit/Registry Number (If any) 988003012L35437		Expiration Date 11/1/2015	Date(s) or Period of Inspection 07/14/2015 through 08/26/2015			

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(c)(4)

Number: 6

Nature of Violation:  
6-I (b)(3)-Public Law 112-55 (125 Stat. 552) stance, licensee failed to prepare and submit ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers when disposing of two or more pistols or revolvers, or any combination thereof, within five consecutive business days, to an unlicensed person, as required by regulation.

Citation: 27 CFR 478.126a

Number: 7

Nature of Violation:  
7-Licensee failed to retain in alphabetical, chronological or numerical order ATF Form 4473s obtained in the course of transferring custody of the firearm (b)(3)-Public Law 112-55 (125 Stat. 552) instances). I (b)(3)-Public Law 112-55 (125 Stat. 552) tance, licensee had duplicated a transaction number on ATF Form 4473 for (b)(3)-Public Law 112-55 (125 Stat. 552) In many instances, there were “missing” forms. These forms had been voided by licensee and were not being retained in numerical order.

Citation: 27 CFR 478.124(b)

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

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

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

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

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

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

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

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

236

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Revised April 2005

U.S. Department of Justice

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Report of Violations

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License/Permit/Registry Number (If any) 988003012L35437	Expiration Date 11/1/2015	Date(s) or Period of Inspection 07/14/2015 through 08/26/2015
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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:  
8-The licensee disposed of a firearm to an unlicensed person having reasonable cause to believe that the individual was prohibited from purchasing/possessing firearms. On ATF Form 4473  
(b)(3)- Public Law 112-55 (125 Stat. 552)

Citation: 27 CFR 478.99(c)

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

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

Licensee was reminded that if an individual answers “Yes” in blocks 11b through 11k of ATF Form 4473, licensee should not proceed with the transaction since the buyer has indicated they are prohibited from purchasing/possessing a firearm. Prior to completion of the inspection, IOI (b) (6) conducted a NICS check on purchaser (b) (6) which revealed no prohibiting information.

237

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Revised April 2005

## Report of Violations

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### Inspection Results

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

Number: 9

#### Nature of Violation:

9-The licensee failed to accurately and timely maintain the firearms acquisition and disposition record:

- In 3 instances, licensee transferred a firearm with no acquisition and disposition entry;
- In 3 instances, licensee failed to timely and/or accurately record the acquisition of a firearm;
- In 1 instance, licensee failed to record the acquisition of a firearm prior to inspection;
- In 3 instances, licensee failed to timely and/or accurately record the disposition of a firearm;
- In 1 instance, licensee failed to record the disposition of a firearm.

Citation: 27 CFR 478.125(e)

#### Date Corrections to be Made:

*(If not corrected immediately)*

#### Corrective Action to be Taken:

*(If not corrected immediately)*

Licensee was instructed to ensure acquisition and disposition entries are timely and accurately made in the A&D record. On August 25, 2015, IOI (b) (6) verified that the corrections were made to the A&D record.

Number: 10

#### Nature of Violation:

10-As required by regulation, licensee failed to report a change in trade name and furnish the license for endorsement to the Chief, Federal Firearms Licensing Center. The Federal Firearms License is issued to CCS Guns, LLC. Licensee advertises the business as CCS Gunsmithing (business cards, Internet website, e-mail address, storefront advertising).

Citation: 27 CFR 478.53

Date Corrections to be Made: 08/25/2015

*(If not corrected immediately)*

#### Corrective Action to be Taken:

*(If not corrected immediately)*

On August 26, 2015, licensee was instructed to furnish the license to ATF Federal Firearms Licensing Center for amendment adding the new trade name. Licensee was reminded to report future changes in trade name timely.



U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

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License/Permit/Registry Number <i>(If any)</i> 988003012L35437		Expiration Date 11/1/2015	Date(s) or Period of Inspection 07/14/2015 through 08/26/2015			

Inspection Results

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

Number: 11

Nature of Violation:  
11-It shall be unlawful for any licensed importer, licensed manufacturer, licensed dealer, or licensed collector knowingly to make any false entry in, to fail to make appropriate entry in, or to fail to properly maintain, any record which he is required to keep pursuant to section 923 of this chapter or regulations promulgated thereunder. On July 22, 2015, licensee created and sent via facsimile transmittal to IOI [REDACTED] [REDACTED]

Citation: 18 U.S.C. 922(m)

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

Corrective Action to be Taken: No corrective action is possible.  
*(If not corrected immediately)*

I Have Received a Copy of This Report of Violations <i>(Proprietor's signature and title)</i>	Date
Signature and Title of ATF Officer	Date

239

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Revised April 2005

# FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

**Address:** 2216 S Rainbow Blvd.  
Las Vegas, NV 89146

## 1 - Introduction

### Inspection Profile:

On July 14, 2015, Industry Operations Investigators (IOI) (b)(6) and (b)(6) initiated an onsite firearm compliance inspection of the Type 01 (Dealer in Firearms Other Than Destructive Devices) license held by CCS Guns, LLC.

Responsible persons Chris Eifealtdt (Chris), identified by Nevada Driver's License (NVDL) (b)(6) and Sandra Eifealtdt (Sandra) NVDL (b)(6) were present during the course of inspection. Also present was employee (b)(6).

IOIs (b)(6) (b)(6) also assisted during the inspection.

The period of inspection was July 14, 2014 to July 14, 2015. No other Federal, State or local agencies were involved. Advance notice was not provided to licensee. This assignment was generated as a recall inspection; no special instructions were provided.

### Business Profile:

Licensee primarily provides gunsmith services along with wholesale and retail sales from a commercial storefront location in Las Vegas, Nevada. Licensee does not transact in internet sales, gun show transactions, pawn transactions or sales of black powder.

During the last 12 months, licensee acquired approximately (b)(4) firearms and disposed of approximately (b)(4) firearms. The Licensee's Acquisition and Disposition (A&D) book reflects (b)(4) used firearms, (b)(4) new; (b)(4) long guns, (b)(4) handguns. Licensee's primary supplier for firearms is (b)(4).

No other business is operated from the location. Licensee has obtained business licenses LV S25-00049 (Secondhand Dealer) and LV F03-00058 (Pistol Permit), and State of Nevada business license NV19971042924. Licensee is in compliance with zoning requirements. Licensee has no off-site storage.

# FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

## **Ownership and Control:**

Licensee holds the FFL as a domestic limited liability company registered with Nevada Secretary of State, currently in active status (**Exhibit 1**). Chris and Sandra Eifealtdt are listed as managing members of the LLC and responsible persons on the license. There have been no changes in ownership since the license was issued.

No hidden ownership was suspected. No changes are necessary to the Federal Licensing System database.

## **Variance:**

Licensee holds no variances and none were requested as a result of this inspection.

## **2 - Recommendation**

Violations and Revocation/Denial of Renewal Application.

## **3 - Inspection History**

<b>Date of Inspection:</b>	February 4, 2013
<b>Type of Inspection:</b>	Compliance (Recall)
<b>UI#:</b>	786090-2013-0014-B1B
<b>Inspection Results:</b>	IOI recommended revocation of the license.
<b>Cited Violations:</b>	27 CFR 478.124(c)(1) 27 CFR 478.124(c)(4) 27 CFR 478.102(a) 27 CFR 478.125(e)

<b>Date of Inspection:</b>	August 16, 2010
<b>Type of Inspection:</b>	Compliance (Recall)
<b>UI#:</b>	786090-2010-0139-B1B
<b>Inspection Results:</b>	IOI recommended violations, DIO Held Warning Conference ILO revocation.
<b>Cited Violations:</b>	27 CFR 478.21(a) 27 CFR 478.102(a)(2)(ii) 27 CFR 478.102(c) 27 CFR 478.124(c)(1) 27 CFR 478.124(c)(3)(i) 27 CFR 478.124(c)(3)(iv)

## FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

27 CFR 478.124(c)(5)  
27 CFR 478.125(e)  
27 CFR 478.126a

**Date of Inspection:** December 9, 2008  
**Type of Inspection:** Compliance (Recall)  
**UI#:** 786090-2008-0071-B1B  
**Inspection Results:** IOI recommended violations, Warning Conference with Warning Letter and Recall.  
**Cited Violations:** 27 CFR 478.99(c)  
27 CFR 478.124(c)(1)  
27 CFR 478.124(c)(3)(iv)  
27 CFR 478.125(e)

**Date of Inspection:** May 30, 2007  
**Type of Inspection:** Special Request  
**UI#:** 786015-2007-0223-B1B  
**Inspection Results:** No violations, No further action, Referrals made.  
**Cited Violations:** None

**Date of Inspection:** April 10, 2007  
**Type of Inspection:** Compliance (Recall)  
**UI#:** 786075-2007-0110-B1B  
**Inspection Results:** IOI recommended violations, ROV only and Recall.  
**Cited Violations:** 27 CFR 478.124(c)(1)  
27 CFR 478.124(c)(3)(ii)  
27 CFR 478.125(e)

**Date of Inspection:** November 17, 2005  
**Type of Inspection:** Compliance  
**UI#:** 786015-2006-0044-B1B  
**Inspection Results:** IOI recommended violations, Warning Conference with Warning Letter and Recall.  
**Cited Violations:** 27 CFR 478.21(a)  
27 CFR 478.99(c)  
27 CFR 478.102(c)  
27 CFR 478.124(c)(1)  
27 CFR 478.124(c)(3)(i)  
27 CFR 478.124(c)(3)(ii)  
27 CFR 478.124(c)(3)(iv)  
27 CFR 478.124(c)(4)  
27 CFR 478.124(c)(5)  
27 CFR 478.125(e)

## FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

**Date of Inspection:** June 17, 2003  
**Type of Inspection:** Amended Firearms Qualification  
**UI#:** 786015-2003-0433-NFO  
**Inspection Results:** Approve with noted corrections.  
**Cited Violations:** None

**Date of Inspection:** April 7, 2003  
**Type of Inspection:** Compliance  
**UI#:** 786015-2003-0228-A1F  
**Inspection Results:** No further action.  
**Cited Violations:** None

**Date of Inspection:** May 15, 2001  
**Type of Inspection:** Compliance  
**UI#:** 786015-2001-0225-A1F  
**Inspection Results:** No further action.  
**Cited Violations:** None

**Date of Inspection:** October 28, 1998  
**Type of Inspection:** Qualification  
**UI#:** 78604-990216-FR  
**Inspection Results:** Inspect with regular frequency. No further field action is required at this time.  
**Cited Violations:** None

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

A complete inventory was conducted. There were approximately (b)(3) - 1 firearms in inventory and (b)(3) - 1 open entries in the A&D record with (b)(3) - 1 discrepancies:

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



## FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

Licensee maintains the A&D record in bound book format; the record was in proper format; however, numerous entries had not been made timely and/or correctly.

In (b)(3) instances, licensee transferred a firearm with no acquisition and disposition entry in the A&D record:

- (b)(3) - 112 Public Law 55 125 Stat 552 [REDACTED]. (Reference Worksheet 1, Firearm (b)(3) - 112 Public Law 55 125 Stat 552; Exhibit 11a);
- In (b)(3) instances, licensee failed to record the acquisition and disposition of a firearm. These firearms were sent for repair and subsequently returned to CCS Guns. Licensee admitted they failed to record the acquisition and disposition of these firearms once returned from repair. (Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibit 7);
- (b)(3) - 112 Public Law 55 125 Stat 552 [REDACTED] (Reference Worksheet 1, Firearm (b)(3) - 112 Public Law 55 125 Stat 552; Exhibit 7z).

See Exhibit 7 for firearms (b)(3) - 112 Public Law 55 125 Stat 552 and supporting documentation.

In (b)(3) - 1 instances, licensee incorrectly/untimely recorded the acquisition of a firearm:

In (b)(3) instances, licensee incorrectly recorded the acquisition of a firearm, using an unregistered FFL name/trade name:

- In (b)(3) instances, licensee recorded (b)(3) - 112 Public Law 55 125 Stat 552 [REDACTED] Reference: Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552 [REDACTED]; Exhibits 2, 3 and 10.
- In (b)(3) - 1 instance, licensee recorded (b)(3) - 112 Public Law 55 125 Stat 552 [REDACTED] Reference, Worksheet 1, Firearm (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 3 and 10.
- In (b)(3) - 1 instances, licensee recorded (b)(3) - 112 Public Law 55 125 Stat 552 [REDACTED]” Reference, Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 3 and 10.
- In (b)(3) - 112 instances, licensee recorded (b)(3) - 112 Public Law 55 125 Stat 552 [REDACTED] Reference, Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 3 and 10.

## FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

- In (b)(3) - 1 instance, licensee recorded (b)(3) - 112 Public Law 55 125 Stat 552  
Reference, Worksheet 1, Firearm (b)(3) - 1; Exhibits 3 and 10.

In (b)(3) instances, licensee recorded the incorrect FFL number:

- In (b)(3) - 1 instances, licensee recorded (b)(3) - 112 Public Law 55 125 Stat 552  
(Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552  
Exhibits 2, 3, 10 and 11c);
- In (b)(3) - 1 instance, licensee recorded (b)(3) - 112 Public Law 55 125 Stat 552  
(Reference Worksheet 1, Firearm (b)(3) - 1; Exhibits 2 and 10);
- In (b)(3) - 112 F instances, licensee recorded (b)(3) - 112 Public Law 55 125 Stat 552  
(Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 3, 10 and 11c);
- In (b)(3) - 1 instance, licensee recorded (b)(3) - 112 Public Law 55 125 Stat 552  
( (Reference Worksheet 1, Firearm (b)(3) - 1; Exhibits 2 and 10);
- In (b)(3) - 1 instances, licensee recorded (b)(3) - 112 Public Law 55 125 Stat 552  
(b)(3) - 112 Public Law 55 125 Stat 552 (Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 3 and 10);
- In (b)(3) - 1 instance, licensee recorded (b)(3) - 112 Public Law 55 125 Stat 552  
(b)(3) - 112 Public Law 55 125 Stat 552 (Reference Worksheet 1, Firearm (b)(3) - 1; Exhibits 3 and 10);
- In (b)(3) - 1 instances, licensee recorded (b)(3) - 112 Public Law 55 125 Stat 552  
(Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 3 and 10);
- In (b)(3) - 1 instances, licensee recorded (b)(3) - 112 Public Law 55 125 Stat 552  
(Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 3 and 10);
- In (b)(3) - 1 instances, licensee recorded (b)(3) - 112 Public Law 55 125 Stat 552  
(Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 3 and 10);
- In (b)(3) - 112 F instances, licensee recorded (b)(3) - 112 Public Law 55 125 Stat 552  
(Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 3 and 10).

## FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

In (b)(3) instances, licensee failed to record an acquisition address (**Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 2 and 3**);

In (b)(3) instances, licensee failed to record the complete acquisition address (**Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 2 and 3**);

In (b)(3) instances, licensee failed to record the complete acquisition FFL number/address (**Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 2 and 3**);

In (b)(3) instances, licensee failed to record the acquisition FFL name (**Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 2 and 3**);

In (b)(3) instance, licensee failed to record the manufacturer of the firearm (**Reference Worksheet 1, Firearm (b)(3); Exhibit 2**);

In (b)(3) instance, licensee recorded the incorrect manufacturer (**Reference Worksheet 1, Firearm (b)(3); Exhibit 2 and 11b**);

In (b)(3) instances, licensee failed to record the model of the firearm (**Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552, 106; Exhibits 2 and 4**);

In (b)(3) instances, licensee incorrectly recorded the serial number (**Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 2, 8c, 8j, 8p, 11a, 11c, 11d**);

In (b)(3) instances, licensee failed to record the type of the firearm (**Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibit 4**);

In (b)(3) instances, licensee failed to record the caliber/gauge of the firearm (**Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibit 4**);

In (b)(3) instance, licensee failed to record the acquisition of the firearm prior to inspection (**Reference Worksheet 1, Firearm (b)(3); Exhibit 4**).

In (b)(3) instances, licensee failed to record the disposition of a firearm timely and/or correctly:

In (b)(3) instances, licensee failed to record the complete disposition address/FFL # (**Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 2 and 4**);

In (b)(3) instances, licensee failed to record the correct FFL number (**Reference Worksheet 1, Firearms (b)(3) - 112 Public Law 55 125 Stat 552; Exhibits 2 and 10**);



# FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

In (b)(3)-(b)(7) instances, licensee failed to record the correct FFL name (**Reference Worksheet 1, Firearms (b)(3)-(b)(7); Exhibits 2, 3 and 10**);

In (b)(3)-(b)(7) instances, licensee failed to record the complete disposition name (**Reference Worksheet 1, Firearms (b)(3)-(b)(7); Exhibits 2 and 10**);

In (b)(3)-(b)(7) instances, licensee incorrectly recorded the ATF Form 4473 (numbers transposed) (**Reference Worksheet 1, Firearms (b)(3)-(b)(7); Exhibits 3 and 8i**);

In (b)(3)-(b)(7) instances, licensee failed to record the correct disposition date (**Reference Worksheet 1, Firearms (b)(3)-(b)(7); Exhibit 3**);

In (b)(3) instances, licensee recorded the disposition of a firearm but not timely and/or correctly. These firearms were sent for repair to another FFL; licensee admitted that they maintained an open disposition in the gunsmith book for these entries and once returned from repair, were disposed of (untimely) through the gunsmith book (**Reference Worksheet 1, Firearms (b)(3)-(b)(7); Exhibit 5**).

(b)(3)-(b)(7) suspicious purchaser was identified as a result of this inspection (See Section 10 of this report for elaboration). No firearms with obliterated serial numbers or illegal firearms were discovered as a result of this inspection. No loss reports were submitted as a result of this inspection.

## Standard Operating Procedure

Licensee maintains the firearms record in bound book format. (b)(6) stated she is primarily responsible for maintaining the A&D records, (b)(6) also assists with recordkeeping.

## **5 - ATF Forms 4473 – NICS & Other Dispositions**

Licensee had (b)(3)-(b)(7) ATF Form 4473s on file for the inspection period. The audit log was verified with no discrepancies noted. Licensee had not conducted any law enforcement transfers during the inspection period. Licensee had received three NICS denials during the inspection period.

Licensee had conducted several FFL transfers and was maintaining copies of the licenses on file. (b)(3)-(b)(7) suspicious purchaser was identified as a result of this inspection.

A review of (b)(3)-(b)(7) ATF Form 4473s on file for the inspection period revealed the following errors:

- On (b)(3)-(b)(7) form, block 2 (zip code) (b)(6) was incorrect (**Exhibit 8i**);

## FIREARMS INSPECTION REPORT

Name: CCS Guns LLC  
Trade Name:

UI#: 786090-2014-0300-B1B  
FFL#: 9-88-003-01-5L-35437

- On (b)(3)-(4) form, block 6 (gender) ((b)(6)) was blank (Exhibit (b)(3));
- On (b)(3)-(4) form, block 10a (ethnicity) ((b)(6)) was blank (Exhibit (b)(3));
- On (b)(3)-(4) form, block 11a "Are you the actual transferee/buyer of the firearm(s) listed on this form?" was answered "No." ((b)(6)) (Exhibit (b)(3));
- On (b)(3)-(4) form, block 11b "Are you under indictment or information in any court for a felony, or any other crime, for which the judge could imprison you for more than one year?" was answered "Yes." ((b)(6)) (Exhibit (b)(3));
- On (b)(3)-(4) form, block 14 (country of citizenship) was blank ((b)(6)) (Exhibit (b)(3));
- On (b)(3)-(4) form, block 17 (certification date) was blank ((b)(6)) (Exhibit (b)(3));
- On (b)(3)-(4) form, block 17 (certification date) was incorrect ((b)(6)) (Exhibit (b)(3));
- On (b)(3)-(4) forms, block 20a (Issuing Authority of Identification) was incomplete ((b)(6)) (Exhibits (b)(3) - 112 Public Law 55 125 Stat 552);
- On (b)(3)-(4) forms, block 21c (response initially provided by NICS) was blank ((b)(6)) (Exhibit (b)(3) - 112 Public Law 55);
- On (b)(3)-(4) form, block 21d (if NICS response was "delayed") was blank ((b)(6)) (Exhibit (b)(3));
- On (b)(3)-(4) forms, block 24 (transferee/buyer's signature) was incorrect ((b)(6)) (Exhibits (b)(3) - 112 Public Law 55 125 Stat 552);
- On (b)(3)-(4) forms, block 25 (recertification date) was incorrect ((b)(6)) (Exhibits (b)(3) - 112 Public Law 55 125 Stat 552);
- On (b)(3)-(4) form, block 28 (serial number) was blank ((b)(6)) (Exhibit (b)(3));
- On (b)(3)-(4) forms, block 29 (type) was blank ((b)(6)) (Exhibits (b)(3) - 112 Public Law 55 125 Stat 552);
- On (b)(3)-(4) forms, block 30 (caliber or gauge) was blank ((b)(6)) (Exhibits (b)(3) - 112 Public Law 55 125 Stat 552);

**Reference: Worksheet 2; Report of Violations, Violations 1-5.**

### Standard Operating Procedure

Licensee obtains ATF Forms 4473 from ATF Distribution Center. Licensee pre-numbers each ATF Form 4473; however, they were not maintaining them in alphabetical, chronological or numerical order. Licensee was cited for this violation (**Reference: Report of Violations, Violation 7**). Further, licensee was not maintaining the denied forms separately from the proceeded transactions. Sandra states that she pre-numbers each ATF Form 4473 and when a customer is ready to complete Section A, an employee retrieves a form from the top of the stack. She admitted that the employees do not always retrieve the ATF Form 4473s in numerical order and therefore, many of the forms that had been "voided" by licensee were out of numerical order or were found to be duplicate numbers.

# FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

During the course of inspection, IOI (b)(6) suggested to Sandra that she not assign a number to ATF Form 4473 until the transaction is completed. IOI (b)(6) suggested that licensee maintain an inbox or holding area for those forms where the transactions had been completed and at the end of the day, number the forms and record the dispositions in the A&D record. Sandra immediately stated "No, that's not going to happen." When IOI (b)(6) asked why, she stated that she wouldn't be able to keep them straight.

## 6 - Multiple Sales

The Violent Crime Analysis Branch (VCAB) Report indicated that the licensee conducted (b)(3) multiple sales involving (b)(3) firearms during the inspection period. (b)(3) - 112 unreported multiple sale was discovered:

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

When investigators discovered the multiple sale, Sandra became argumentative and stated that "No one had ever told her that." However, it was shown in many instances that licensee is familiar with the reporting requirements for multiple sales of handguns.

### Standard Operating Procedure

In most multiple sale transactions, licensee completes ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers the same day of the sale by faxing to ATF Tracing Center. As required by regulation, licensee attaches a copy of the ATF Form 3310.4 to the ATF Form 4473 associated with that multiple sale.

## 7 - Suspicious/Prohibited Purchasers

(b)(3) - 112 suspicious purchaser was identified as a result of this inspection:

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

# FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

A referral was submitted to San Francisco Intel Group (See Referral 2015-0052).

## 8 - Trace Activity

During the last 12 months, licensee has had (b)(3) trace request which was completed successfully. Licensee had 29 used firearms in inventory; a secondary market analysis was conducted on all 29 resulting in no hits. During the last 12 months, licensee acquired approximately (b)(4) used firearms and disposed of approximately (b)(4) used firearms.

## 9 - NFA/Importer/Collector/Manufacturer

A query of the National Firearm Registration and Transfer Record revealed no NFA firearms registered to licensee. Licensee does not hold a Special Occupational Tax and does not transact in NFA firearms. Licensee is not an importer or collector of firearms.

## 10 - Referrals

(b)(3) referral was generated as a result of this inspection. See Referral 2015-0052.

## 11 - Other

During the inspection, it was noted that the licensee displays the Youth Handgun Safety Act Poster and has copies of the Youth Handgun Safety Act Notice available. The secure gun storage/safety procedures were discussed with the licensee.

During the inspection, licensee's attitude vacillated between cooperation (providing requested documents promptly), to uncooperative and at times, contempt for the investigators' presence.

- While IOI (b)(6) was making copies of A&D pages, Chris approached IOI (b)(6) and inquired why she was making copies of their books. (b)(6) asked IOI (b)(6) if she thought that that was intrusive and "How do you think my customers would feel if they knew you were copying their information?"
- Once IOIs (b)(6) and (b)(6) commenced photocopying of the A&D books, Sandra was heard to comment: "I know what bullshit smells like, and this is bullshit."
- When instructed on a procedural matter, Sandra stated that wasn't what she had been told at the warning conference (UI 786090-2013-0014-B1B). She stated that she had instructed (b)(6), who was in the room at the

## FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

conference, to audio record the warning conference meeting. When IOI (b)(6) asked Sandra if she still had the recording, she stated that she didn't; that she had "gotten rid of it."

- When IOI (b)(6) confronted Chris about an incorrect serial number in block 28 on ATF Form 4473 which he had completed, he rolled his eyes, stated "My eyesight's bad" and immediately left the room; Sandra stated that she "felt bad" about the error. At the closing meeting with Chris, IOI (b)(6) asked him how he thought his customers would feel if they knew he was recording the incorrect serial number on a form that they signed. Chris had no comment.
- Several times during the course of inspection, IOI (b)(6) spoke with Chris about writing legibly in the required records. At one point, he became defensive and stated "Excuse me?!"
- Several times during the inspection, Sandra stated: "All ATF wants to do is shut down all the FFLs."
- When IOI (b)(6) requested information via telephone regarding the gunsmith log book and untimely dispositions, Chris could be heard in the background on speaker phone stating "This is bullshit!"

On July 21, 2015, IOI (b)(6) contacted licensee via electronic mail to obtain copies of (b)(3) - 112 F "voided" ATF Forms 4473 numbered (b)(3) - 112 Public Law 55 125 Stat 552. These forms had not been accounted for during the course of inspection. On July 22, 2015, licensee sent via facsimile, copies of the forms (Exhibits (b)(3) - 112 F) to IOI (b)(6). Utilizing Accurant database, IOI (b)(6) was able to verify the individual and/or address listed on (b)(3) - 112 F of the forms ((b)(6) (b)(3) - 112 F). A query of (b)(3) - 112 Public Law 55 125 Stat 552 (and many variations of the name) indicated that no individual with this name existed in the database. Further, the residence address listed in block 2 "(b)(6)" was not a valid address. Also of note was that Section A, blocks 1 and 2 had been completed, blocks 3-9 were blank, and block 10a (ethnicity) had been completed<sup>1</sup>. At the closing meeting on August 26, 2015, IOI (b)(6) confronted Chris that she believed he had falsified this ATF Form 4473. IOI (b)(6) told Chris that she believed this based on the information mentioned above, along with a review of his handwriting on many records kept by licensee, for example, ATF Forms 4473 and A&D. IOI (b)(6) told Chris that she noticed he has a very distinctive way of writing the letter "C" and that licensee's records and the "C" in (b)(6) appear to be the same. IOI (b)(6) then handed Chris a copy of licensee's A&D page containing several annotations with the letter "C." IOI (b)(6) had highlighted these entries and stated that she knew one of the entries, SN (b)(3) - 112 Public Law 55 125 Stat ,

<sup>1</sup> This was particularly noteworthy since during the review of the Report of Violations, Violation 1 where licensee was cited for failure to ensure block 10a was completed, Chris facetiously stated "Oh, is that one of those Mexicans."

# FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

(Exhibit (b)(3)) had been made by Chris because IOI (b)(6) and Sandra had had a conversation about that very entry the day before. Sandra commented that customers often come in and “try something on,” or say they don’t have the money on them and then leave. IOI (b)(6) asked Chris and Sandra if they remembered the (b)(6) transaction. Neither Chris nor Sandra indicated they remembered this individual. During the entire confrontation, Chris nodded his head several times, remained calm and stood with his hands folded in front of him; he made no verbal admission, or denial, that he had falsified the form.

## 12 - Closing Actions

On August 26, 2015, IOI (b)(6) conducted a closing conference with responsible persons Chris and Sandra Eifealtd. IOI (b)(6) was present for the meeting. The result of the inspection was discussed and a Report of Violations was issued which Sandra Eifealtd signed. IOI (b)(6) discussed with applicant each of the following publications along with the regulatory requirements: Firearms Transaction Record (ATF F 4473); Firearm Inventory Theft/Loss Report (ATF F 3310.11 and ATF E3310.6); Open Letter to Nevada FFLs dated August 26, 2011 re: Concealed Carry Permits; Information re: FFL EZ Check; Youth Handgun Safety Act Poster (ATF I 5300.1); Youth Handgun Safety Act Notice (ATF I 5300.2); Reporting Change of Address/ATF F 5300.38; Personal Firearms Record (ATF P 3312.8). IOI (b)(6) reviewed the Acknowledgement of Federal Firearms Regulations checklist with responsible persons Chris and Sandra Eifealtd; licensee indicated that they understood all of the information by initialing each block, signing, and dating the Acknowledgement (Exhibit 13).

On September 23, 2015, IOI (b)(6) amended the Report of Violations and provided licensee with a copy via electronic mail. Specifically, Violation 9 was amended as follows: (b)(3) instances of transferring a firearm with no acquisition and disposition entry (originally (b)(3)); (b)(3) instances of failing to timely and/or accurately record the disposition of a firearm (originally (b)(3)).

## 13 - Violations

### 1. **27 CFR 478.21(a) - REPEAT OF VIOLATION CITED ON DECEMBER 15, 2010 AND DECEMBER 15, 2005**

**Nature of Violation:** Licensee failed to ensure accurate completion of all sections of ATF Form 4473 prior to transfer of a firearm to an individual. Of the 142 ATF Forms 4473 reviewed for the inspection period:

- On (b)(3) - 1 form (b)(3) - 112), block 10a (ethnicity) was blank;
- On (b)(3) - 1 form (b)(3) - 1), in block 11a (actual purchaser), buyer answered “No”;
- On (b)(3) - 112) forms (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)), blocks 24 and

## FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

25 were incorrect.

**Licensee's Response:** Licensee provided no explanation for the errors.

**Corrective Action:** Licensee was reminded to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of the firearm to an individual.

**Reference:** Exhibits (b)(3) - 112 Public Law 55 125 Stat 552; Worksheet 2.

2. **27 CFR 478.124(c)(1) - REPEAT OF VIOLATION CITED ON APRIL 18, 2013, DECEMBER 15, 2010, APRIL 27, 2009, APRIL 13, 2007 AND DECEMBER 15, 2005**

**Nature of Violation:** Licensee failed to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the (b)(3) - 11 ATF Forms 4473 reviewed for the inspection period:

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

**Licensee's Response:** Licensee provided no explanation for the errors.

**Corrective Action:** Licensee was reminded to ensure completion of all sections of the ATF Form 4473 prior to transfer of the firearm to an individual.

**Reference:** Exhibits (b)(3) - 112 Public Law 55 125 Stat; Worksheet 2.

3. **27 CFR 478.124(c)(3)(i)- REPEAT OF VIOLATION CITED ON DECEMBER 15, 2010 AND DECEMBER 15, 2005**

**Nature of Violation:** Licensee failed to ensure completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the (b)(3) - 11 ATF Forms 4473 reviewed for the inspection period: On (b)(3) - 11 forms ((b)(6). (b)(3) - 112 Public Law 55 125 Stat 552 (b)(6). (b)(3) - 112 Public Law 55 125 Stat 552), block 20a (Issuing Authority/Type of Identification) was incorrect/incomplete.

**Licensee's Response:** Licensee provided no explanation for the errors.

**Corrective Action:** Licensee was reminded to ensure completion of all sections of the ATF Form 4473 prior to transfer of the firearm to an individual.

## FIREARMS INSPECTION REPORT

Name: CCS Guns LLC  
Trade Name:

UI#: 786090-2014-0300-B1B  
FFL#: 9-88-003-01-5L-35437

Reference: Exhibits (b)(3) - 112 Public Law 55 125 Stat 552; Worksheet 2.

4. **27 CFR 478.124(c)(3)(iv) - REPEAT OF VIOLATION CITED ON DECEMBER 15, 2010, APRIL 27, 2009 AND DECEMBER 15, 2005**

**Nature of Violation:** Licensee failed to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the 142 ATF Forms 4473 reviewed for the inspection period:

- On (b)(3) - 112 Public Law 55 125 Stat 552 forms (b)(3) - 112 Public Law 55 125 Stat 552), block 21c (Response initially provided by NICS/State) was blank;
- On (b)(3) - 112 Public Law 55 125 Stat 552 form (b)(3) - 112 Public Law 55 125 Stat 552), block 21d (If initial response was delayed) was incomplete.

**Licensee's Response:** Licensee provided no explanation for the errors.

**Corrective Action:** Licensee was reminded to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of the firearm to an individual.

Reference: Exhibits (b)(3) - 112 Public Law 55 125 Stat 552; Worksheet 2.

5. **27 CFR 478.124(c)(4) - REPEAT OF VIOLATION CITED ON APRIL 18, 2013 AND DECEMBER 15, 2005**

**Nature of Violation:** Licensee failed to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the 142 ATF Forms 4473 reviewed for the inspection period:

- On (b)(3) - 112 Public Law 55 125 Stat 552 form (b)(3) - 112 Public Law 55 125 Stat 552), block 28 (serial number) was blank;
- On (b)(3) - 112 Public Law 55 125 Stat 552 form (b)(3) - 112 Public Law 55 125 Stat 552), block 28 (serial number) was incorrect;
- On (b)(3) - 112 Public Law 55 125 Stat 552 forms (b)(3) - 112 Public Law 55 125 Stat 552), block 29 (type) was blank;
- On (b)(3) - 112 Public Law 55 125 Stat 552 forms (b)(3) - 112 Public Law 55 125 Stat 552), block 30 (caliber) was blank.

**Licensee's Response:** Licensee provided no explanation for the errors.

**Corrective Action:** Licensee was reminded to ensure completion of all sections of the ATF Form 4473 prior to transfer of the firearm to the individual. On August 25, 2015, licensee photocopied the incorrect pages, made corrections to the copies and attached the corrected pages to the original ATF Form 4473.

Reference: Exhibits (b)(3) - 112 Public Law 55 125 Stat 552; Worksheet 2.

6. **27 CFR 478.126a - REPEAT OF VIOLATION CITED ON DECEMBER 15, 2010**



## FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

**Nature of Violation:** In (b)(3) instance, licensee failed to prepare and submit ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers when disposing of two or more pistols or revolvers, or any combination thereof, within five consecutive business days, to an unlicensed person, as required by regulation.

**Licensee's Response:** Licensee became defensive and stated "No one ever told me that."

**Corrective Action:** On July 21, 2015, licensee prepared ATF Form 3310.4 for the transaction and submitted the forms. IOI (b)(6) verified through ATF ETrace database that the multiple sale report was received by ATF Tracing Center. The licensee was instructed to ensure accurate and timely completion and submission of ATF Form 3310.4 for all multiple handgun transactions.

**Reference:** Exhibit 8g-8h; Worksheet 2.

### 7. 27 CFR 478.124(b)

**Nature of Violation:** Licensee failed to retain in alphabetical, chronological or numerical order each ATF Form 4473 obtained in the course of transferring custody of the firearms. In (b)(3) instance, licensee had duplicated a transaction number on ATF Form 4473 for (b)(3) separate transactions. In many instances, there were "missing" forms. These forms had been voided by licensee and were not being retained in numerical order.

**Licensee's Response:** Licensee stated she pre-numbers ATF Forms 4473 and employees pull from the top of the stack when a customer is ready to complete the form. Licensee provided no explanation for the duplicate numbering. When IOI (b)(6) recommended licensee maintain an "inbox" and number the form once the transaction has been completed and upon disposing from the A&D record, licensee stated "No, that's not going to happen."

**Corrective Action:** Licensee will continue to pre-number the forms; however, IOI (b)(6) advised licensee to maintain the voided ATF Forms 4473 so all numbered forms can be accounted for.

### 8. 27 CFR 478.99(c) - REPEAT OF VIOLATION CITED ON APRIL 27, 2009 AND DECEMBER 15, 2005

**Nature of Violation:** The licensee disposed of a firearm to an unlicensed person having reasonable cause to believe that the individual was prohibited from purchasing/possessing firearms. On ATF Form 4473 (b)(3) - 112 Public Law 55 125 Stat 552, purchaser

## FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

(b)(6) answered "Yes" in response to question 11b.: "Are you under indictment or information in any court for a felony, or any other crime, for which the judge could imprison you for more than one year?" In block 21c. of ATF Form 4473 for this transaction, licensee indicated that on (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) [REDACTED]. In block 21d. of ATF Form 4473 for this transaction, licensee indicated that a proceed response was received from NICS/State.

**Licensee's Response:** Licensee became defensive and stated "No one ever told me that."

**Corrective Action:** Licensee was reminded that if an individual answers "Yes" in blocks 11b through 11k of ATF Form 4473, licensee should not proceed with the transaction since the buyer has indicated they are prohibited from purchasing/possessing a firearm. Prior to completion of the inspection, IOI (b)(6) conducted a NICS check on purchaser (b)(6) which revealed no prohibiting information.

**Reference:** Exhibit (b)(3); Worksheet 2.

9. **27 CFR 478.125e - REPEAT OF VIOLATION CITED ON APRIL 18, 2013, DECEMBER 15, 2010, APRIL 27, 2009, APRIL 13, 2007 AND DECEMBER 15, 2005**

**Nature of Violation:** The licensee failed to accurately and timely maintain the firearms acquisition and disposition record:

- In (b)(3) instances, licensee transferred a firearm with no acquisition and disposition entry;
- In (b)(3)-1 instances, licensee failed to timely and/or accurately record the acquisition of a firearm;
- In (b)(3)-1 instance, licensee failed to record the acquisition of a firearm prior to inspection;
- In (b)(3) instances, licensee failed to timely and/or accurately record the disposition of a firearm;
- In (b)(3)-1 instance, licensee failed to record the disposition of a firearm.

**Licensee's Response:** Licensee stated that they were told previously by ATF to record the firearms sent to another manufacturer/gunsmith for repair the way they were recording the transactions. Regarding the (b)(3)-1 inaccurate entries, in many instances, Sandra Eifealtdt stated that these entries were made by Chris and stated she could tell that the information from the previous lines in the A&D log were being copied, without verifying the correct FFL number.

## FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

**Corrective Action:** Licensee was instructed to ensure acquisition and disposition entries are timely and accurately made in the A&D record. On August 25, 2015, IOI (b)(6) verified that the corrections were made to the A&D record.

**Reference:** Exhibits (b)(3) - 112 Public Law 55 125 Stat 552; Worksheet 1.

**10. 27 CFR 478.53**

**Nature of Violation:** As required by regulation, licensee failed to report a change in trade name and furnish the license for endorsement to the Chief, Federal Firearms Licensing Center. The Federal Firearms License is issued to CCS Guns, LLC. Licensee advertises the business as CCS Gunsmithing (business cards, Internet website, e-mail address, storefront advertising).

**Licensee's Response:** Licensee provided no explanation for the errors.

**Corrective Action:** On August 25, 2015, licensee was instructed to furnish the license to ATF Federal Firearms Licensing Center for amendment adding the new trade name. Licensee was reminded to report future changes in trade name timely.

**Reference:** Exhibit 12.

**11. 18 USC 922(m)**

**Nature of Violation:** It shall be unlawful for any licensed importer, licensed manufacturer, licensed dealer, or licensed collector knowingly to make any false entry in, to fail to make appropriate entry in, or to fail to properly maintain, any record which he is required to keep pursuant to section 923 of this chapter or regulations promulgated thereunder. On July 22, 2015, licensee created and sent via facsimile transmittal to IOI (b)(6) ATF F 4473, (b)(6).

**Licensee's Response:** When confronted, Chris made no verbal statement regarding this. Sandra commented that customers often come in and try something on, or say they don't have the money on them and then leave. IOI (b)(6) asked licensee if they remember the (b)(6) transaction. Neither Chris nor Sandra indicated they remembered this individual.

**Corrective Action:** No corrective action is possible.

**Reference:** Exhibits 9a-9c.

# FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

X

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Industry Operations Investigator

## Index of Worksheets and Exhibits

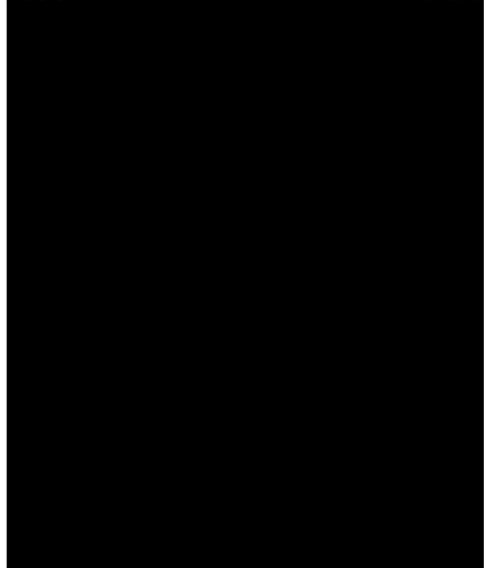
### Worksheets

- 1 – Inventory, A&D
- 2 – ATF Form 4473 Review

### Exhibits


1. Secretary of State, Nevada entity details for CCS Guns, LLC
2. CCS Guns A&D Record (b)(3) - 112 Public
3. CCS Guns A&D Record (b)(3) - 112 Public Law
4. CCS Guns A&D Record Gunsmith (b)(3) - 112 Public
5. CCS Guns CCS A&D Log Book Entries (b)(3) - 112 Public Law 55 125 Stat 55
6. CCS Repair Ticket 2349842 (b)(3) - 112 Public Law 55
7. List of Repair/Returned Firearms with supporting documentation (b)(3) - 112 Public Law 55 125 Stat 55
8. ATF Forms 4473:

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



9. ATF Forms 4473 (voided):

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



## FIREARMS INSPECTION REPORT

**Name:** CCS Guns LLC  
**Trade Name:**

**UI#:** 786090-2014-0300-B1B  
**FFL#:** 9-88-003-01-5L-35437

c. Schlaf, H

10. FFL EZ Check/Federal Licensing System Printouts:

CCS Guns LLC (9-88-35437)

(b) (4)

A series of approximately 15 horizontal black bars of varying lengths, representing redacted information for item 10.

11. Distributor Invoices/A&D Documentation

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

A large solid black rectangular block covering the majority of the page, representing redacted information for item 11.

12. Webpage printout and Business Card (Violation 10)

13. Acknowledgement of Federal Firearms Regulation Checklist dated 8/26/2015

Referral: 2015-0052