

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.) 786090-2017-0051-B1B		
	3. PERMIT/LICENSE NUMBER 988003012L35437	4a. TARGET DATE	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

6. ATF OFFICER(S) ASSIGNED
(b)(6) - Assigned Investigator
(b)(6) - Lead Investigator

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
(b)(6), Area Supervisor, 01/09/2017

8. PURPOSE/SPECIAL INSTRUCTIONS

9. INSPECTION RESULTS		<input checked="" type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	3	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS		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

Viols WL ONLY and No Recall Inspection

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
FEB 2017	28.00		
ATF OFFICER'S SUBTOTAL	28.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
JAN 2017	4.00		
FEB 2017	49.00		
MAR 2017	14.00		
ATF OFFICER'S SUBTOTAL	67.00	ATF OFFICER'S SIGNATURE (b)(6)	
TOTAL HOURS	95.00		

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

<input checked="" type="checkbox"/> REVIEWED	<input checked="" type="checkbox"/> CONCUR	<input type="checkbox"/> SEE COMMENTS	<input checked="" type="checkbox"/> FINAL DISPOSITION
SIGNATURE AND TITLE (b)(6)		LAS VEGAS III AREA SUPERVISOR	
		REVIEWED By (b)(6) at 9:41 am, Mar 13, 2017	

ATF EF 5700.14 (10-98) For Official Use Only

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.) 786090-2017-0051-B1B		
	3. PERMIT/LICENSE NUMBER 988003012L35437	4a. TARGET DATE	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

ROUTING SEQUENCE AND DATE

- ☒ 1. FFLC-CUSTER
- ☒ 2. LAS VEGAS III AREA FILE
- ☐ 3.
- ☐ 4.

CONTROL FILE POSTED DATE _____

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.

License/Permit/Registry Number *(If any)*
988003012L35437

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

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

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

Repeat violation cited in 2005, 2010 & 2014.

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

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

Repeat violation previously cited in 2005, 2010, and 2014, but different specific error.

130

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 CCS GUNS LLC	Street Address 2216 S RAINBOW BLVD	City LAS VEGAS	State NV	Zip Code 89146-	County CLARK	Page 2 of 2 Pages
License/Permit/Registry Number <i>(If any)</i> 988003012L35437		Expiration Date 11/1/2018		Date(s) or Period of Inspection 02/07/2017 through 02/14/2017		

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 make timely and accurate entries in the Acquisition and Disposition (A&D) logs, in (b)(3) instances. (b)(3) open entries in the inventory A&D log contained errors in the serial number. (b)(3) firearms in inventory had not been logged in prior to the inspection, including (b)(3) the licensee described as a "parts gun" and (b)(3) for which the entry was started but then whited out. (b)(3) Public firearms transferred on ATF Forms 4473 had not been timely logged out, and for (b)(3) additional firearm there was a duplicate open entry which was not closed when the firearm was transferred. (b)(3) Public firearms which were returned to customers were not timely logged out of the repair log.

Repeat violation previously cited in 2005, 2007, 2010, 2013 and 2014.

Citation: 27 CFR 478.125(e)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensees corrected the erroneous A&D log entries, and instituted a new procedure for tracking the return of repaired firearms.

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

Date

Signature and Title of ATF Officer

Date



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
8965 South Eastern, Suite 220
Las Vegas, NV 89123

March 13, 2016

www.atf.gov

Warning Letter

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

CCS GUNS LLC
CCS GUNSMITHING
2216 S. RAINBOW BOULEVARD
LAS VEGAS, NV 89146
RE: 9-88-003-01-8L-35437

Dear Mr. Chris Eifealtdt and Mrs. Sandra Eifealtdt:

During a recent inspection at your firearms business covering the period January 2016 through January 2017, you were cited for violations of Title 27, Code of Federal Regulations, Part 478. A copy of the Report of Violations (ATF F 5030.5) issued at the time of the inspection is enclosed.

All violations were fully explained to you or your designated responsible person by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Industry Operations Investigator(s). You or your responsible person indicated that you understood the requirements of the firearms laws and regulations and that corrective actions would be taken to eliminate future violations.

While this inspection showed improvement from previous ATF inspections, this inspection resulted in three violations, which are repeat violations that from prior inspections. I insist that you continue to improve in these areas and that you implement the policies you promised to implement during our previous meetings. In particular, you must improve with regard to the maintenance of your Acquisition & Disposition (A&D) records. I recommend that you conduct full inventory reconciliations on a regular basis. By regularly comparing the firearms inventory to your A&D records, you will be able to ensure that you make correct entries in the A&D record in a timely manner.

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. Your compliance is critical to carrying out our mission to protect the public and to ensure that criminals do not gain access to firearms. ATF appreciates the efforts you and other industry members make in this area. We look forward to continuing to work with you in that regard.

You are reminded that retention of your Federal firearms license is conditioned upon your compliance with Federal laws and regulations. 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 ensure that future compliance is achieved.

Please contact me at (b)(6) 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)

Area Supervisor
Las Vegas III Field Office

cc: Federal Firearms Licensing Center
Director, Industry Operations, San Francisco Field Division
Las Vegas III Field Office

FIREARMS INSPECTION REPORT

Name: CCS Guns, LLC
Trade Name: CCS Gunsmithing

UI#: 786090-2017-0051-B1B
FFL#: 9-88-003-01-2L-35437

Address: 2216 S. Rainbow Boulevard
Las Vegas, NV 89146 Clark County

1 - Introduction

Inspection Profile:

Industry Operation Investigators (IOIs) (b)(6) and (b)(6) conducted this Recall Compliance Inspection beginning February 7, 2017, meeting with Responsible Persons Sandra Eifealtd (dl (b)(6)) and Chris Eifealtd (dl (b)(6)) at the licensed premises, a gunsmith shop which also conducts some retail sales of firearms. The scope of the inventory was review of ATF Forms 4473 and firearms repair transactions for January 2016 through January 2017, and a full inventory verification. Advance notification of the inspection was not given to the licensees.

Business Profile:

CCS Gunsmithing is located in an urban strip mall. The business is primarily gunsmithing, with some firearms sales and participation in NRA dinner auctions. At the time of the inspection, approximately 5/6 of the firearms on hand were in the repair log, with only 60 firearms in the sales inventory. The sales inventory is entirely new firearms. The licensee does not conduct internet sales. The licensee's website, CCSGunsmithing.com, references their repair services and participation in NRA and Ducks Unlimited events.

There are no other business activities conducted at the premises or by the licensees, and there are no other ATF licenses or permits required for their operations. IOI (b)(6) examined the licensee's state and local licenses, and verified they were current and sufficient for the operations (Exhibit 1).

Ownership and Control:

FIREARMS INSPECTION REPORT

Name: CCS Guns, LLC
Trade Name: CCS Gunsmithing

UI#: 786090-2017-0051-B1B
FFL#: 9-88-003-01-2L-35437

Mr. and Mrs. Eifealtdt are the two partners in the LLC. There have been no changes to ownership or control and no hidden ownership is suspected. The Responsible Persons are correctly listed in FLS.

Please add the following email address to the FLS record:

ccsguns@att.net.

Variance:

The licensee holds no variances and none are required for their operations.

2 - Recommendation

Violations, Warning Letter, no Recall Inspection.

3 - Inspection History

Date and Type of Inspection:	7/14/2015, Recall Compliance
UI#:	786090-2014-0300-B1B
Inspection Results:	IOI recommended revocation of the license. Outcome: Warning conference in lieu of revocation.
Cited Violations:	27 CFR 478.21(a), Repeat 27 CFR 478.124(c)(1), Repeat

FIREARMS INSPECTION REPORT

Name: CCS Guns, LLC
Trade Name: CCS Gunsmithing

UI#: 786090-2017-0051-B1B
FFL#: 9-88-003-01-2L-35437

27 CFR 478.124(c)(3)(i), Repeat
27 CFR 478.124(c)(3)(iv), Repeat
27 CFR 478.124(c)(4), Repeat
27 CFR 478.126a, Repeat
27 CFR 478.124(b)
27 CFR 478.99(c), Repeat
27 CFR 478.125e, Repeat
27 CFR 478.53
18 USC 922(m)

Date and Type of Inspection: 2/4/2013, Recall Compliance
UI#: 786090-2013-0014-B1B
Inspection Results: IOI recommended revocation of the license
Cited Violations: 27 CFR 478.124(c)(1)
27 CFR 478.124(c)(4)
27 CFR 478.102(a)
27 CFR 478.125(e)

Date and Type of Inspection: 8/16/2010, Recall Compliance
UI#: 786090-2010-0139-B1B
Inspection Results: DIO Warning Conference in lieu of revocation
Cited Violations: 27 CFR 478.21(a)
27 CFR 478.102(a)(2)(ii)
27 CFR 478.102(c)

FIREARMS INSPECTION REPORT

Name: CCS Guns, LLC
Trade Name: CCS Gunsmithing

UI#: 786090-2017-0051-B1B
FFL#: 9-88-003-01-2L-35437

27 CFR 478.124(c)(1)
27 CFR 478.124(c)(3)(i)
27 CFR 478.124(c)(3)(iv)
27 CFR 478.124(c)(5)
27 CFR 478.125(e)
27 CFR 478.126a

Date and Type of Inspection: 12/9/2008, Recall Compliance
UI#: 786090-2008-0071-B1B
Inspection Results: Violations, Warning Conference, 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 and Type of Inspection: 5/30/2007, Special Request
UI#: 786015-2007-0223-B1B
Inspection Results: Request completed, Referrals made, no violations
Cited Violations: None

Date and Type of Inspection: 4/10/2007, Recall Compliance
UI#: 786075-2007-0110-B1B
Inspection Results: Violations, Report of Violations and Recall

FIREARMS INSPECTION REPORT

Name: CCS Guns, LLC **UI#:** 786090-2017-0051-B1B
Trade Name: CCS Gunsmithing **FFL#:** 9-88-003-01-2L-35437

Cited Violations: 27 CFR 478.124(c)(1)
27 CFR 478.124(c)(3)(ii)
27 CFR 478.125(e)

Date and Type of Inspection: 11/17/2005, Compliance
UI#: 786015-2006-0044-B1B
Inspection Results: Violations Warning Conference, 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)

Date and Type of Inspection: 2001 & 2003, Compliance and Amended Application
Inspection Results: No violations

Date and Type of Inspection: 10/28/1998, Qualification
Inspection Results: License issued

FIREARMS INSPECTION REPORT

Name: CCS Guns, LLC

UI#: 786090-2017-0051-B1B

Trade Name: CCS Gunsmithing

FFL#: 9-88-003-01-2L-35437

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

IOIs (b)(6) and (b)(6) conducted a full inventory verification of firearms in sales inventory and held for gunsmithing services.

The licensees use separate A&D books for their inventory and gunsmithing firearms. There were (b)(3) open entries in the A&D records, and 279 firearms on hand, of which 59 were sales inventory. The errors in the inventory log were (b)(3) open entries containing errors in the serial number; (b)(3) firearms not timely logged in prior to the inspection, including (b)(3) the licensee described as a "parts gun" and (b)(3) for which the entry was started but then whited out; (b)(3) firearms transferred on ATF Forms 4473 had not been timely logged out; and (b)(3) additional firearm for which there was a duplicate open entry. The errors in the repair logs were (b)(3) instances where a firearm was returned to the owner but not logged out. All firearms were accounted for prior to the end of the inspection, and the errors in the A&D log were corrected.

The licensees did not experience any thefts or losses of firearms during the inspection period. The A&D record is in the proper format, with all the required information, however, they were using a convoluted multiple entry method for gunsmithing firearms sent to other licensees for service. The method may have contributed to the untimely disposition entries in the repair log. IOI (b)(6) recommended a different method of tracking repair log interim dispositions, and recommended that customers sign the repair ticket when the firearm is returned. Five inventory firearms and ten repair firearms were tracked through the licensee's records from acquisition to disposition, disclosing some weaknesses in the tracking of repair firearms. The licensee was cited for violation of 27 CFR 478.125(e), in (b)(3) instances. No trafficking indicators were identified. No obliterated serial numbers or illegal firearms were found. The licensees' operating procedures with regard to inventory were adequate, aside from the untimely log entries for returned gunsmithing inventory.

The licensee was cited for violation of 27 CFR 478.125(e) in previous inspections, however, the error rate has been significantly reduced.

FIREARMS INSPECTION REPORT

Name: CCS Guns, LLC

UI#: 786090-2017-0051-B1B

Trade Name: CCS Gunsmithing

FFL#: 9-88-003-01-2L-35437

Reference Violation 3, Worksheet 1, Exhibit 2.

5 - ATF Forms 4473 – NICS & Other Dispositions

IOI (b)(6) examined the (b)(6) ATF Forms 4473 on file for the 12 month inspection period, finding (b)(6) forms which contained errors.

On (b)(6) forms the licensees failed to record alternate identification documents when the primary document was insufficient. The licensee was cited for violation of 27 CFR 478.124(c)(3)(i) in (b)(6) instances. Repeat violation cited in three previous inspections.

On (b)(6) ATF Form 4473 where a recertification signature was required, the customer did not resign the form. On (b)(6) form the transferee answered “No” to the question “Are you the actual transferee/buyer” but the transfer was completed. Further information from the licensee indicated this was a form-completion error, and that the customer was the actual transferee. The licensee was cited for violation of 27 CFR 478.21(a), in (b)(6) instances.

The licensee transferred firearms to other licensees for additional gunsmithing services and received them back for return to customers. The licensee maintains commercial paperwork to verify these transactions. No discrepancies noted. The licensee did not have any sales to law enforcement officers during the inspection period. The inspection did not reveal any trafficking indicators. IOI (b)(6) used the FFL audit log to verify NICS numbers for denied transactions. Because the licensee’s business is mainly gunsmithing, there were no un-purged completed transactions on the audit log. The licensee’s standard operating procedure is to assign their employee to review ATF Forms 4473 and A&D log entries on a weekly basis. Mrs. Eifealtdt stated that she will now conduct a daily review, and rely on the employee’s weekly review as a secondary double-check.

Reference each violation number and all applicable worksheets and exhibits.

Reference Violation 1 & 2, Worksheet 2, Exhibit 3.

FIREARMS INSPECTION REPORT

Name: CCS Guns, LLC

UI#: 786090-2017-0051-B1B

Trade Name: CCS Gunsmithing

FFL#: 9-88-003-01-2L-35437

6 – Multiple Sales

The licensees conducted ten multiple handgun sales during the inspection period, involving [REDACTED] firearms. Comparison to the Violent Crime Analysis Branch FFL Master Query list shows the multiple handgun transfer were timely submitted.

7 – Suspicious/Prohibited Purchasers

The inspection did not reveal any suspicious or prohibited purchasers. The licensee provided further information for the one transaction where the transferee indicated on ATF Form 4473 that he was not the actual transferee. In that instance, the owner of the firearm had passed away while his firearm was being repaired, and the form was completed to transfer the firearm to the owner's brother, who was, in fact, the actual recipient.

8 – Trace Activity

The licensee responded [REDACTED] firearms trace requests in the 12 month inspection period. All were resolved timely and successfully.

9 - NFA/Importer/Collector/Manufacturer

The licensee does not conduct any of these operations.

10 - Referrals

This inspection was not initiated in response to a referral, and no referrals were generated as a result of the inspection.

FIREARMS INSPECTION REPORT

Name: CCS Guns, LLC

UI#: 786090-2017-0051-B1B

Trade Name: CCS Gunsmithing

FFL#: 9-88-003-01-2L-35437

11 - Other

The licensee has the Youth Handgun Safety Act poster displayed, and has the pamphlets available for customers. The licensee is in compliance with secure gun storage and safety device requirements.

12 - Closing Actions

IOIs (b)(6) and (b)(6) held a closing conference with Mr. and Mrs. Eifealtdt on February 13, 2017, reviewing the results of the inspection and relevant portions of the Federal Firearms Regulations. Mrs. Eifealtdt signed the acknowledgment form (Exhibit 4).

On February 28, 2017, IOI (b)(6) emailed the Report of Violations to CCS Gunsmithing. Sandra Eifealtdt called and reviewed the form with IOI (b)(6) and then emailed the signed form back.

13 - Violations

1. **27 CFR 478.21(a) – REPEAT OF VIOLATION CITED 9/23/2015, 12/15/2010 & 12/15/2005**

Nature of Violation

Failure, on (b)(3) ATF Forms 4473 of 152 reviewed, to ensure accurate completion of the form prior to transfer of a firearm to an individual. (b)(3) - 112 Public Law 55 125 Stat 552

[REDACTED]

Licensee's Response

Mrs. Eifealtdt expressed surprise that she had missed these errors. She stated that the customer who responded "No" to question 11a may have done so because he was not buying the firearm, but rather taking possession of one which had been owned by his late brother, but she acknowledged that she should have caught the error.

FIREARMS INSPECTION REPORT

Name: CCS Guns, LLC

UI#: 786090-2017-0051-B1B

Trade Name: CCS Gunsmithing

FFL#: 9-88-003-01-2L-35437

Corrective Action

The licensee will institute a second review of ATF Forms 4473.

Reference Report of Violations, Worksheet 2, Exhibit 3.

2. **27 CFR 478.124(c)(3)(i) – REPEAT OF VIOLATION CITED 9/23/2015, 12/15/2010 & 12/15/2005**

Nature of Violation

Failure, on (b)(3) - 1121 ATF Forms 4473 of (b)(3) - 11 examined, to examine and record alternate documentation where the primary identification document presented by the transferee does not show the current residence address.

Licensee's Response

Sandra Eifealtdt stated that she and her husband now had a better understanding of the identification requirements.

Corrective Action

The licensee must examine and record qualifying secondary identification documents, where the primary document presented does not show a current residence address for the transferee.

Reference Report of Violations, Worksheet 2, Exhibit 3.

3. **27 CFR 478.125(e) – REPEAT OF VIOLATION CITED 9/23/2015, 4/18/2013, 12/15/2010, 4/27/2009, 4/13/2007 & 12/15/2005**

Nature of Violation

Failure to make timely and accurate entries in the Acquisition and Disposition (A&D) logs, in (b)(3) instances. (b)(3) - 11 open entries in the inventory A&D log contained errors in the serial number. (b)(3) - 112 firearms in inventory had not been logged in prior to the inspection, including (b)(3) - 11 the licensee described as a "parts gun" and (b)(3) - 11 for which the entry was started but then whited out. (b)(3) - 112 firearms transferred on ATF Forms 4473 had not been timely logged out, and for (b)(3) - 11 additional firearm there was a duplicate open entry which was not closed when the firearm was transferred. (b)(3) - 112 firearms which were returned to customers were not timely logged out of the repair log.

FIREARMS INSPECTION REPORT

Name: CCS Guns, LLC
Trade Name: CCS Gunsmithing

UI#: 786090-2017-0051-B1B
FFL#: 9-88-003-01-2L-35437

Licensee's Response

Sandra Eifealtdt stated that she has already implemented the recommended corrective actions.

Corrective Action

Sandra Eifealtdt stated that she was implementing changes in the operating procedures for recording acquisitions and dispositions, including asking gunsmithing customers to sign the work ticket and log book when they pick up their firearms, so that the disposition entry will be created immediately, and implanting a weekly review of complete transactions.

Reference Report of Violations, Worksheet 1, Exhibit 2.

(b)(6)	Industry Operations Investigator	3/7/2017
Signature	Title	Date of Report

Index of Worksheets and Exhibits

Report of Violations

Worksheet Workbook

Exhibit 1 – Local Permits

Exhibit 2 – A&D Untimely Dispositions

Exhibit 3 – ATF Forms 4473 containing errors

FIREARMS INSPECTION REPORT

Name: CCS Guns, LLC

UI#: 786090-2017-0051-B1B

Trade Name: CCS Gunsmithing

FFL#: 9-88-003-01-2L-35437

Exhibit 4 – Acknowledgment of Federal Firearms Regulations

Warning Letter