U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY)	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.)		
LC Action Police Supply Ltd. 1088 N 1st Street San Jose,CA 95112-4924, Santa Clara	786060-2015-0287-B1B		
	3. PERMIT/LICENSE NUMBER 977085018C37865	4a. TARGET DATE 9/15/2015	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, 07/22/2015

8. PURPOSE/SPECIAL INSTRUCTIONS

9. INSPECTION RESULTS		☐ CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	7	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
Submitted by (b)(6) - Industry Operations Investigator

Submitted on: 10/27/2015

Viols WL ONLY and Recall Inspection

12. TIME ACCOUNTING DATA

ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)		
AUG 2015	45.00	
SEP 2015	26.00	
ATF OFFICER'S SUBTOTAL	71.00	ATF OFFICER'S SIGNATURE
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)		
JUL 2015	2.00	
AUG 2015	57.00	
SEP 2015	60.00	
OCT 2015	2.00	
ATF OFFICER'S SUBTOTAL	121.00	ATF OFFICER'S SIGNATURE
TOTAL HOURS	192.00	

U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY)	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.)		
LC Action Police Supply Ltd. 1088 N 1st Street San Jose,CA 95112-4924, Santa Clara	786060-2015-0287-B1B		
	3. PERMIT/LICENSE NUMBER 977085018C37865	4a. TARGET DATE 9/15/2015	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

A full inspection was concluded on 9/11/15. A warning letter was issued only. No further action is required.

Viols WL ONLY and No Recall Inspection

☒ REVIEWED ☒ CONCUR ☒ SEE COMMENTS ☒ FINAL DISPOSITION

SIGNATURE AND TITLE	REVIEW DATE
(b)(6) - NSPECT Program Manager	10/29/2015

ROUTING SEQUENCE AND DATE

☐ 1. _____
☐ 2. _____
☐ 3. _____
☐ 4. _____

CONTROL FILE POSTED DATE _____

U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives

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	Street Address	City	State	Zip Code	County	Page 1 of 4 Pages
LC Action Police Supply Ltd.	1088 N 1st Street	San Jose	CA	95112-4924	Santa Clara	

License/Permit/Registry Number *(If any)*	Expiration Date	Date(s) or Period of Inspection
977085018C37865	3/1/2018	09/01/2014 through 08/23/2015

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:

Reporting Multiple Sales or Other Disposition of Pistols and Revolvers – failure to prepare and submit a report of multiple handgun sales or other dispositions. A review of the ATF Forms 4473 executed during the period of inspection disclosed that [redacted] Multiple Handgun Sales Reports involving [redacted] firearms were not prepared or submitted: Multiple Handgun Sales Report – [redacted] not recorded or reported.

Citation: 27 CFR 478.126a

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

Corrective Action to be Taken: *(If not corrected immediately)* The licensee was instructed to make certain that all multiple handgun sales reports are completed and submitted at the time of transfer, and to indicate on the report the date that the form was mailed or faxed.

Number: 2

Nature of Violation:

Reporting Multiple Sales or Other Disposition of Certain Rifles – failure to prepare and submit a report of multiple sales or other disposition of certain rifles. A review of the ATF Forms 4473 executed during the period of inspection disclosed that [redacted] Multiple Sales Reports of Certain Rifles involving [redacted] firearms were not prepared or submitted: Multiple Sales Report of Certain Rifles – [redacted] not recorded or reported.

Citation: 18 U.S.C. 923(g)(5)(A)

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

Corrective Action to be Taken: *(If not corrected immediately)* The licensee was instructed to make certain that all multiple sales reports of certain rifles are completed and submitted at the time of transfer, and to indicate on the report the date that the form was mailed or faxed.

U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives

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	Street Address	City	State	Zip Code	County	Page 2 of 4 Pages
LC Action Police Supply Ltd.	1088 N 1st Street	San Jose	CA	95112-4924	Santa Clara	

License/Permit/Registry Number *(If any)*	Expiration Date	Date(s) or Period of Inspection
977085018C37865	3/1/2018	09/01/2014 through 08/23/2015

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:

Forms Prescribed – failure to furnish all of the information called for in each form. A review of the ATF Forms 4473 executed during the period of inspection disclosed that the licensee failed to ensure that [redacted] forms were properly prepared: Item #11a (Are you the actual transferee/buyer of the firearm(s) listed on this form?) – [redacted] "No" answer; Item #18 (Type of firearm(s) to be transferred) – [redacted] incorrect; & Item #25 (Recertification Date) – [redacted] incorrect. A Repeat Violation.

Citation: 27 CFR 478.21(a)

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

Corrective Action to be Taken: *(If not corrected immediately)* The licensee was instructed to review every ATF Form 4473 for completeness and accuracy, to conduct thorough multiple reviews of all forms, and to have additions and/or corrections made prior to the transfer of firearms. After the transfer, any additions and/or corrections must be made on a copy of the form and attached to the original.

Number: 4

Nature of Violation:

Firearms Transaction Record – failure to secure a properly completed form. A review of the ATF Forms 4473 executed during the period of inspection disclosed that the licensee did not ensure that purchasers properly prepared [redacted] forms: Item #11i (Prohibitive Question asking, "Have you ever renounced your United States citizenship?") – [redacted] unanswered; Item #13 (What is your State of residence?) – [redacted]e incorrect; & Item #17 (Certification Date) – [redacted] incorrect. A Repeat Violation.

Citation: 27 CFR 478.124(c)(1)

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

Corrective Action to be Taken: *(If not corrected immediately)* The licensee was once again instructed to review every ATF Form 4473 for completeness and accuracy, to conduct thorough multiple reviews of all forms, and to have additions and/or corrections made prior to the transfer of firearms. After the transfer, any additions and/or corrections must be made on a copy of the form and attached to the original.

U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives

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	Street Address	City	State	Zip Code	County	Page 3 of 4 Pages
LC Action Police Supply Ltd.	1088 N 1st Street	San Jose	CA	95112-4924	Santa Clara	

License/Permit/Registry Number *(If any)*	Expiration Date	Date(s) or Period of Inspection
977085018C37865	3/1/2018	09/01/2014 through 08/23/2015

Inspection Results

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

Number: 5

Nature of Violation:

Firearms Transaction Record – failure to record all required information regarding NICS/DROS Checks. A review of the ATF Forms 4473 executed during the period of inspection disclosed that the licensee did not ensure that (b)(3) forms having one or more discrepancies were properly prepared: Item #21a (Date NICS/DROS Contacted) – (b)(3) incorrect; Item #21b (NICS/DROS Transaction Number) – (b)(3) Pub not completed; & Item #21c (Initial response by NICS/DROS) – (b)(3) not completed. A Repeat Violation.

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)* The licensee was once more instructed to review every ATF Form 4473 for completeness and accuracy, to conduct thorough multiple reviews of all forms, and to have additions and/or corrections made prior to the transfer of firearms. After the transfer, any additions and/or corrections must be made on a copy of the form and attached to the original.

Number: 6

Nature of Violation:

Firearms Transaction Record – failure to complete the form upon transfer. A review of the ATF Forms 4473 executed during the period of inspection disclosed that the licensee did not properly complete (b)(3) form: Item #36 (Date Transferred) – (b)(3) incorrect. A Repeat Violation.

Citation: 27 CFR 478.124(c)(5)

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

Corrective Action to be Taken: *(If not corrected immediately)* The licensee was once more instructed to review every ATF Form 4473 for completeness and accuracy, to conduct thorough multiple reviews of all forms, and to have additions and/or corrections made prior to the transfer of firearms. After the transfer, any additions and/or corrections must be made on a copy of the form and attached to the original.

U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives

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	Street Address	City	State	Zip Code	County	
LC Action Police Supply Ltd.	1088 N 1st Street	San Jose	CA	95112-4924	Santa Clara	Page 4 of 4 Pages

License/Permit/Registry Number *(If any)*	Expiration Date	Date(s) or Period of Inspection
977085018C37865	3/1/2018	09/01/2014 through 08/23/2015

Inspection Results

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

Number: 7

Nature of Violation:

Firearms Receipt and Disposition by Dealers – failure to properly record each receipt and disposition for firearms. A review of the Acquisition and Disposition Record Books and an audit of the on-hand inventory revealed [redacted] dispositions not recorded. A Repeat Violation.

Citation: 27 CFR 478.125(e)

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

Corrective Action to be Taken: The licensee was instructed to maintain complete and accurate Acquisition and Disposition Records and to timely record all required information.
(If not corrected immediately)

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

RIP

U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

www.atf.gov

October 29, 2015

Ms. Darsi Miller, President/CEO
LC Action Police Supply Ltd.
1088 N 1st Street
San Jose, CA 95112-4924

RE: 9-77-085-01-8C-37865

Dear Ms. Miller:

During a recent inspection at your firearms business covering the period of September 1, 2014, to August 23, 2015, 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 by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Industry Operations Investigator. You indicated that you understood the requirements of the firearms laws and regulations and 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. This 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. 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.

LC Action Police Supply Ltd.

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

Sincerely yours,

(b)(6)

Dublin III Area Supervisor

Enclosure

c: Federal Firearms Licensing Center
Dublin III (IO) Field Office

FIREARMS INSPECTION REPORT

Name: LC Action Police Supply Ltd. **UI#:** 786060-2015-0287-B1B
Trade Name: (None Used) **FFL#:** 9-77-085-01-8C-37865

Address: 1088 N. 1st Street
San Jose, CA 95112-4924

1 - Introduction

Inspection Profile:

Ms. Darsi Andrea Miller, President/CEO, and Ms. Ardis E. Gant, Senior Vice President, of LC Action Police Supply Ltd., were identified by their respective California Driver Licenses (b)(6) , expires 09/16/17 &(b)(6) , expires 01/20/17). They were both interviewed at the licensed premises by Industry Operations Investigators (b)(6) and(b)(6) without other agency participation, though the California Department of Justice did happen to arrive later the same day to commence an independent inspection of the licensee. The inspection period was from 09/01/14 – 08/23/15, commencing on 08/24/15 without advance notice. The assignment was issued to conduct a Disposition Emphasis Compliance Inspection of this Type 01 – Dealer in Firearms Licensee and was accomplished in accordance with the Industry Operations Manual.

Business Profile:

The licensee is a high volume, wholesale/retail dealer of firearms and accessories to law enforcement agencies and personnel, which are conducted at a centralized location in San Jose. Their clientele base is far-flung as (b)(4) They advertise through a website which results in internet sales. During the last 12 months they acquired (b)(4) and disposed of (b)(4) firearms. Both new and used firearms are obtained and sold, with a(b)(4) , and of those (b)(4) being handguns. Their primary suppliers are (b)(4) . They do not participate at gun shows. No other businesses are conducted at the licensed premises nor is there involvement with outside business ventures. The license, held since 02/28/97, is appropriate for the activities conducted and no other ATF Licenses or Permits are required. All State and local licenses/permit are current. Off-site storage locations are not utilized.

Reference: Exh. #1 & #2.

Ownership and Control:

The licensee is a California Limited Corporation, with Mesdames Miller and Gant as the only officers/stockholders. Since the last inspection a change had occurred within the corporation with the passing of Mr. John J. Ralph, Financial Partner, which was reported to ATF on 04/28/14. His passing did not affect the ownership and/or control of the corporate entity nor did it reveal any hidden ownership. No other individuals are involved with or have vested interest in the

business operations. The FLS Database properly reflects Mesdames Miller and Gant as the only responsible persons.

Reference: Exh. #3.

Variance:

No variances are on file and none were requested by or of the licensee.

2 - Recommendation

Violations, a Warning Letter only, and a Recall Inspection.

3 - Inspection History

Date and Type of Inspection:	09/22/11 – Firearms Compliance Inspection
UI#:	786060-2011-0308-B1B
Inspection Results:	No violations, no further action, and no referrals.
Cited Violations:	None

Date and Type of Inspection:	02/21/10 – Recall Firearms Compliance Inspection
UI#:	786090-2010-0045-B1B
Inspection Results:	Violations and recommended DIO Warning Conference (held 07/14/10) in lieu of Revocation.
Cited Violations:	27 CFR 478.21(a)-Repeat Violation; .99(b)(2); .124(c)(1)-Repeat Violation; .124(c)(3)(i)-Repeat Violation; .124(c)(3)(ii); .124(c)(3)(iv)-Repeat Violation; .124(c)(4)-Repeat Violation; .124(c)(5); & .125(e)-Repeat Violation.

Date and Type of Inspection:	02/09/09 – Recall Firearms Compliance Inspection
UI#:	786090-2009-0153-B1B
Inspection Results:	Violations and recommended 2nd Warning Conference (held 07/09/09).
Cited Violations:	27 CFR 478.21(a)-Repeat Violation; .124(c)(3)(iv)-Repeat Violation; .124(c)(4); & .125(e)-Repeat Violation.

Date and Type of Inspection:	01/04/05 – TIP Firearms Compliance Inspection
UI#:	786015-2005-0063-B1B
Inspection Results:	Recommended revocation of license – DIO decision

Name: LC Action Police Supply Ltd. UI#: 786060-2015-0287-B1B
Trade Name: (None Used) FFL#: 9-77-085-01-8C-37865

was to renew license.

Cited Violations: 27 CFR 478.21(a); .102(c); .124(c)(1)-Repeat Violation; .124(c)(3)(i); .124(c)(3)(iv); & .125(e)-Repeat Violation.

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

Recently hired Special Agent (b)(6) joined IOIs (b)(6) and (b)(6) with the inventory audit and A&D Record Books review which found 987 firearms on-hand, but [redacted] open book entries. A reconciliation was conducted which revealed [redacted] dispositions (1.4%) that had not been recorded. These missing entries were completed during the inspection. No thefts or losses were submitted during the inspection period. The A&D Record Books were found to be in the proper format, with all information being accurate, and most entries timely made, except as previously noted. No firearms were traced through the licensee's records. No trafficking issues were identified, or firearms found with obliterated serial numbers, nor illegally obtained firearms. The licensee's Standard Operating Procedures were reviewed and discussed regarding the missing disposition entries. It was found that the majority of the missing entries (72%) were multi-firearm sales made to law enforcement agencies by way of purchase orders. It was suggested that all purchase orders completed and filed each month be reviewed at the start of the following month to verify that all of the firearms sold were closed in the A&D Record Books. As to the ATF Forms 4473, they also are filed monthly, so it was suggested that a final review be made to verify that each form was also closed in the record books. The licensee was cited and issued a Report of Violations, ATF EF 5030.5, for Repeat Violations of 27 CFR 478.125(e).

Reference: W/S #1 & Violation #5.

5 - ATF Forms 4473 – NICS & Other Dispositions

IOIs (b)(6) and (b)(6) conducted a review of the ATF Forms 4473 executed and on-file. An examination made for completeness and accuracy of [redacted] forms disclosed [redacted] forms (0.3%) having one or more discrepancies. Completed forms are filed by the transfer date and denied/cancelled forms are filed separately. All waiting period transfer exemption sales of official duty firearms to law enforcement personnel were found properly documented and recorded. No trafficking issues were discovered. Verification was also made of 871 Gun Audit Log entries. The licensee's Standard Operating Procedures were discussed and found needing more reviews by additional personnel in order to verify that all ATF Forms 4473 are complete and accurate. The licensee was cited and issued a Report of Violations, ATF EF 5030.5, for Repeat Violations of 27 CFR 478.21(a); .124(c)(1); .124(c)(3)(iv); & .124(c)(5).

Reference: W/S #2; Exh. #4; & Violations #1 – #4.

6 – Multiple Sales

A request of the Violent Crime Analysis Branch for a Firearms Trace History (FTH) Report disclosed that the licensee was associated with [redacted] multiple sale transactions involving [redacted] firearms. The review of ATF Forms 4473 verified the preparation and submission of Multiple Sales of Handgun Reports and Multiple Sales of Certain Rifle Reports. The review did reveal [redacted] multiple handgun sales and [redacted] multiple certain rifle sales involving [redacted] firearms that were not recorded or reported. These missing reports were completed and submitted during the inspection. It was suggested to the licensee that an "M" be placed atop the ATF Form 4473 to identify to multiple sales to reviewers. The licensee was cited and issued a Report of Violations, ATF EF 5030.5, for violations of 27 CFR 478.126a and 18 USC 923(g)(5)(A).

Reference: W/S #2; Exh. #5; and Violations #6 & #7.

7 – Suspicious/Prohibited Purchasers

No suspicious/prohibited purchasers were found, no trafficking revealed, no straw purchasing noted, or referrals made as a result of the inspection

8 – Trace Activity

The FTH Report also disclosed that the licensee was associated with [redacted] firearm trace requests, including [redacted] duplicates, [redacted] not completed to an individual purchaser, and [redacted] interstate Theft Consignee Report involving [redacted] firearms, all of which were recovered. A secondary market analysis was not conducted.

9 - NFA/Importer/Collector/Manufacturer

The licensee does not import, collect, or manufacturer, but does deal in NFA Weapons. The licensee purchases NFA Weapons that are dropped-shipped by the manufacturer to purchasing law enforcement agencies, but never to individuals. (b)(3) - 26 USC 6103

[redacted]

Reference: Exh. #6 & #7.

Name: LC Action Police Supply Ltd. UI#: 786060-2015-0287-B1B
Trade Name: (None Used) FFL#: 9-77-085-01-8C-37865

10 - Referrals

No referrals were generated as a result of the inspection.

11 - Other

The licensee displays and makes available the Youth Handgun Safety Act poster and brochure, as well as having secure gun storage and safety devices on-hand.

The FLS Database does not indicate an EIN which should be: [redacted].

12 - Closing Actions

A closing conference was held on 09/11/15 between Mesdames Miller & Gant and IOI [redacted] regarding the results of the inspection, the various discrepancies found, and the corrective actions to be taken. Regarding the on-hand inventory, they were instructed to conduct multiple reviews to verify that all dispositions are timely recorded. As to the ATF Forms 4473, they were instructed to conduct thorough multiple reviews of all forms to reduce or eliminate the discrepancies found and were encouraged to utilize the State-mandated, 10-day waiting period for all firearm transfers in order to scrutinize each and every form for completeness and accuracy, and to add additional reviewers.

At the conclusion of the conference, Mesdames Miller and Gant were provided with a current list of TF addresses/telephone numbers. The Acknowledgement of Federal Firearm Regulations pertaining to the Federal Firearms Reference Guide was also given to them. The acknowledgement and guide were reviewed and discussed, during which informational handouts and various form were provided, as well as questions answered. Ms. Miller then signed and dated the acknowledgement and as given a copy for their information, records, and future reference.

Reference: Exh. #8.

13 - Violations

1. 27 CFR 478.21(a) – Repeat Violation cited on 02/21/10; 02/09/09; & 01/04/05.

Nature of Violation: Forms Prescribed – failure to furnish all of the information called for in each form. A review of the ATF Forms 4473 executed during the period of inspection disclosed that the licensee failed to ensure that [redacted] forms were properly prepared:

Item #11a (Are you the actual transferee/buyer of the firearm(s) listed on this form?) – [redacted] "No" answer; Item #18 (Type of firearm(s) to be transferred) – [redacted] incorrect; & Item #25 (Recertification Date) – [redacted] incorrect.

Licensee's Response: Ms. Miller stated that the oversight and errors were the result of one person having to do too much, but that she will require a second reviewer in order to have more complete and thorough reviews of forms.

Corrective Action: The licensee was instructed to review every ATF Form 4473 for completeness and accuracy, to conduct thorough multiple reviews of all forms, and to have additions and/or corrections made prior to the transfer of firearms. After the transfer, any additions and/or corrections must be made on a copy of the form and attached to the original.

Reference: W/S #2 & Exh. #4.

2. 27 CFR 478.124(c)(1) – Repeat Violation cited on 02/21/10; 01/04/05; &04/03/01.

Nature of Violation: Firearms Transaction Record – failure to secure a properly completed form. A review of the ATF Forms 4473 executed during the period of inspection disclosed that the licensee did not ensure that purchasers properly prepared [redacted] forms:

Item #11j (Prohibitive Question asking, "Have you ever renounced your United States citizenship?") – [redacted] unanswered; Item #13 (What is your State of residence?) – [redacted] incorrect; & Item #17 (Certification Date) – [redacted] incorrect.

Licensee's Response: Ms. Miller could not explain why these errors were not caught during reviews, especially the one dealing with a possible prohibitive question.

Corrective Action: The licensee was once again instructed to review every ATF Form 4473 for completeness and accuracy, to conduct thorough multiple reviews of all forms, and to have additions and/or corrections made prior to the transfer of firearms. After the transfer, any additions and/or corrections must be made on a copy of the form and attached to the original.

Reference: W/S #2 & Exh. #4.

3. 27 CFR 478.124(c)(3)(iv) – Repeat Violation cited on 02/21/10; 02/09/09; & 01/04/05.

Nature of Violation: Firearms Transaction Record – failure to record all required information regarding NICS/DROS Checks. A review of the ATF Forms 4473 executed during the period of inspection disclosed that the licensee did not ensure that [redacted] forms having one or more discrepancies were properly prepared:

Item #21a (Date NICS/DROS Contacted) – [redacted] incorrect; Item #21b (NICS/DROS

Transaction Number) – three not completed; & Item #21c (Initial response by NICS/DROS) – [redacted] not completed.

Licensee's Response: Ms. Miller could not explain why the errors and omissions were not caught either initially or when double checked.

Corrective Action: The licensee was once more instructed to review every ATF Form 4473 for completeness and accuracy, to conduct thorough multiple reviews of all forms, and to have additions and/or corrections made prior to the transfer of firearms. After the transfer, any additions and/or corrections must be made on a copy of the form and attached to the original.

Reference: W/S #2 & Exh. #4.

4. 27 CFR 478.124(c)(5) – Repeat Violation cited on 02/21/10.

Nature of Violation: Firearms Transaction Record – failure to complete the form upon transfer. A review of the ATF Forms 4473 executed during the period of inspection disclosed that the licensee did not properly complete [redacted] form:

Item #36 (Date Transferred) – [redacted] incorrect.

Licensee's Response: Ms. Miller again said that the error was an oversight, but that it should have been caught at some point during the reviews.

Corrective Action: The licensee was once more instructed to review every ATF Form 4473 for completeness and accuracy, to conduct thorough multiple reviews of all forms, and to have additions and/or corrections made prior to the transfer of firearms. After the transfer, any additions and/or corrections must be made on a copy of the form and attached to the original.

Reference: W/S #2 & Exh. #4.

5. 27 CFR 478.125(e) – Repeat Violation cited on 02/21/10; 02/09/09; &01/04/05.

Nature of Violation: Firearms Receipt and Disposition by Dealers – failure to properly record each receipt and disposition for firearms. A review of the Acquisition and Disposition Record Books and an audit of the on-hand inventory revealed [redacted] dispositions not recorded.

Licensee's Response: Ms. Miller was taken aback at the number of unrecorded dispositions in the Acquisition & Disposition Record Books, but that she would work with her staff to timely record all dispositions in the future.

Corrective Action: The licensee was instructed to maintain complete and accurate Acquisition and Disposition Records and to timely record all required information.

Reference: W/S #1.

6. 27 CFR 478.126a

Nature of Violation: Reporting Multiple Sales or Other Disposition of Pistols and Revolvers – failure to prepare and submit a report of multiple handgun sales or other dispositions. A review of the ATF Forms 4473 executed during the period of inspection disclosed that [redacted] Multiple Handgun Sales Reports involving [redacted] firearms were not prepared or submitted:

Multiple Handgun Sales Report – [redacted] not recorded or reported.

Licensee's Response: Ms. Miller stated that they had prepared and submitted the reports in the past, so she was not sure why these were not competed and submitted.

Corrective Action: The licensee was instructed to make certain that all multiple handgun sales reports are completed and submitted at the time of transfer, and to indicate on the report the date that the form was mailed or faxed.

Reference: W/S #2 & Exh. #5

.

7. 18 USC 923(g)(5)(A)

Nature of Violation: Reporting Multiple Sales or Other Disposition of Certain Rifles – failure to prepare and submit a report of multiple sales or other disposition of certain rifles. A review of the ATF Forms 4473 executed during the period of inspection disclosed that [redacted] Multiple Sales Reports of Certain Rifles involving [redacted] firearms were not prepared or submitted:

Multiple Sales Report of Certain Rifles – [redacted] not recorded or reported.

Licensee's Response: Ms. Miller stated that they were aware of the requirement to prepare and submitted the reports, so she was not sure why these were not competed and submitted.

Corrective Action: The licensee was instructed to make certain that all multiple sales reports of certain rifles are completed and submitted at the time of transfer, and to indicate on the report the date that the form was mailed or faxed.

FIREARMS INSPECTION REPORT

Name: LC Action Police Supply Ltd. UI#: 786060-2015-0287-B1B
Trade Name: (None Used) FFL#: 9-77-085-01-8C-37865

Reference: W/S #2 & Exh. #5.

	Industry Operations Investigator	09/25/15
Signature	Title	Date of Report

Index of Worksheets and Exhibits
Report of Violations, ATF EF 5030.5

W/S #1 – Inventory and A&D Review
W/S #2 – ATF Form 4473 (2012 Edition) Review

Exh. #1 – Local Licenses/Permits
Exh. #2 – State Licenses/Permits for Uses of Dangerous Weapons
Exh. #3 – Letter Regarding Change in Control of LP
Exh. #4 – ATF Forms 4473 with Discrepancies
Exh. #5 – Unrecorded/Unreported Multiple Sale/Disposition of Handguns/Certain Rifles
Exh. #6 – National Firearm Registration and Transfer Record
Exh. #7 – 2016 Special Tax Stamp
Exh. #8 – Acknowledgement of Federal Firearm Regulations