

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) COCHISE SPORTS & RECREATION LLC COCHISE SPORTS & RECREATION 5388 E RICKS RD WILLCOX,AZ 85643, COCHISE	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 785090-2017-0107-B1B			
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">3. PERMIT/LICENSE NUMBER 986003017J07645</td> <td style="width: 33%;">4a. TARGET DATE 9/29/2017</td> <td style="width: 33%;">4b. TARGET HOURS</td> </tr> </table>	3. PERMIT/LICENSE NUMBER 986003017J07645	4a. TARGET DATE 9/29/2017	4b. TARGET HOURS
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	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)			

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

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
(b)(6), Area Supervisor, 11/28/2016

8. PURPOSE/SPECIAL INSTRUCTIONS
 Conduct a full dealer compliance inspection. Conduct 100% inventory of firearms. Conduct a 100% review of ATF Forms 4473 completed during the inspection period.

Be alert for suspicious transactions and trafficking indicators.

Licensee is part of the Never Inspected FY17 compliance inspection initiative.

9. INSPECTION RESULTS		<input 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	2	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: 03/06/2017

Viols ROV ONLY No Recall Inspection

12. TIME ACCOUNTING DATA		
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)	
FEB 2017		20.50
MAR 2017		2.50
ATF OFFICER'S SUBTOTAL	23.00	ATF OFFICER'S SIGNATURE
TOTAL HOURS	23.00	

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION
 Viols WL ONLY and No Recall Inspection

<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) - Area Supervisor	REVIEW DATE 03/06/2017

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) COCHISE SPORTS & RECREATION LLC COCHISE SPORTS & RECREATION 5388 E RICKS RD WILLCOX,AZ 85643, COCHISE	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 785090-2017-0107-B1B		
	3. PERMIT/LICENSE NUMBER 986003017J07645	4a. TARGET DATE 9/29/2017	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

ROUTING SEQUENCE AND DATE

- 1. _____
- 2. _____
- 3. _____
- 4. _____

CONTROL FILE POSTED DATE _____

Amended 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: COCHISE SPORTS & RECREATION LLC COCHISE SPORTS & RECREATION	Street Address 5388 E RICKS RD	City WILLCOX	State AZ	Zip Code 85643-	County COCHISE	Page 1 of 2 Pages
License/Permit/Registry Number (If any) 986003017J07645	Expiration Date 9/1/2017	Date(s) or Period of Inspection 02/06/2017 through 02/08/2017				

Inspection Results

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

Number: 1

Nature of Violation:

Failure to record required acquisition and disposition information in an Acquisition and Disposition (A&D) Record in [redacted] instances. Specifically, failure to accurately or correctly record [redacted] acquisitions in the A&D Record. Failure to accurately or correctly record [redacted] dispositions in the A&D Record. Failure to record [redacted] dispositions of firearms in the A&D Record.

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 licensee was instructed to correct the information for the [redacted] acquisition and [redacted] disposition entries in the A&D Record. The licensee was instructed to record the disposition of [redacted] firearms in the A&D Record.

The licensee was also advised that all information pertaining to the firearm when recorded into the Acquisition portion of the A&D Record must be obtained from the firearm itself, not from the invoice and/or box in which the firearm was packaged.

Number: 2

Nature of Violation:

Failure to complete and retain an ATF Form 4473 in [redacted] instances.

Citation: 27 CFR 478.124(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee was advised that when transferring a firearm to an FFL Responsible Person the Responsible Person must complete an ATF Form 4473 prior to the transfer of a firearm.

Amended

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 COCHISE SPORTS & RECREATION LLC COCHISE SPORTS & RECREATION	Street Address 5388 E RICKS RD	City WILLCOX	State AZ	Zip Code 85643-	County COCHISE	Page 2 of 2 Pages
License/Permit/Registry Number (If any) 986003017J07645	Expiration Date 9/1/2017	Date(s) or Period of Inspection 02/06/2017 through 02/08/2017				

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 conduct a NICS check prior to the transfer of a firearm in (b)(7)(C), (b)(7)(D) instances.



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

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

The licensee was advised that when transferring a firearm to an FFL Responsible Person the Responsible Person must complete an ATF Form 4473 and the licensee must conduct a NICS check, or record a valid state permit which qualifies as a NICS exemption, prior to the transfer of a firearm.

Citation: 27 CFR 478.102(a)

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

	Manassis Member	Date 2/23/17
Signature and Title of ATF Officer (b)(6)		Date 2/21/17



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

www.atf.gov

March 6, 2017

785090 (b) (6)
5300

Cochise Sports & Recreation, LLC
c/o Mr. & Mrs. Frank
5388 East Ricks Road
Willcox, AZ 85643

RE: FFL# 9-86-003-01-7J-07645

Dear Mr. Richard Valentine Frank & Mrs. Brenda Grace Frank,

During a recent inspection at your firearms business covering the period February 6, 2016, to February 6, 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 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 action 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

Cochise Sports & Recreation, LLC
c/o Mr. & Mrs. Frank

otherwise, could be viewed as willful and may result in the revocation of your license. Please ensure that future compliance is achieved.

Should you have any questions regarding this matter, please contact Industry Operations Investigator (b)(6) or myself at (520) 297-2100.

Sincerely yours,

(b)(6)

Area Supervisor

Enclosure

cc: Federal Firearms Licensing Center
Tucson III Field Office

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

7015 1660 0000 9451 9864

Certified Mail Fee \$ 3.45
 Extra Services & Fees (check box, add fee as appropriate)
 Return Receipt (hardcopy) \$ 2.80
 Return Receipt (electronic) \$ _____
 Certified Mail Restricted Delivery \$ _____
 Adult Signature Required \$ _____
 Adult Signature Restricted Delivery \$ _____



Postage \$.61
 Total Postage and Fees \$ 6.86

Sent To Cachise Sports
 Street and Apt. No., or PO Box No. 5388 East Ricks Road
 City, State, ZIP+4® Willcox, AZ 85643

PS Form 3800, April 2015 PSN 7530-02-000-9017 See Reverse for Instructions

FIREARMS INSPECTION REPORT

Name: Cochise Sports & Recreation LLC
Trade Name: Cochise Sports & Recreation

UI#: 785090-2017-0107
FFL#: 9-86-003-01-7J-07645

Address: 5388 East Ricks Road
Willcox, AZ 85643 Cochise County

1 - Introduction

Inspection Profile:

On February 6, 2017, Bureau of Alcohol, Tobacco, Firearms, and Explosives Industry Operations Investigator (IOI) (b)(6) went to 5388 East Ricks Road, Willcox, Arizona 85643 to conduct an unannounced full scope Southwest Border Disposition Emphasis Firearms Compliance Inspection of Cochise Sports & Recreation, Limited Liability Company (LLC) doing business as (dba) Cochise Sports & Recreation. Cochise Sports & Recreation, LLC operates as a Dealer in Firearms, Type 01, Federal Firearms Licensee (FFL).

IOI (b)(6) met with and interviewed Brenda Grace Frank, Member/Responsible Person (RP) and Richard Valentine Frank, Managing-Member/RP, who were identified by their Arizona Driver's Licenses (Number (b)(6) Expiration Date 09/07/2019 and Number (b)(6) Expiration Date 06/16/2017, respectively).

IOI (b)(6) identified himself as a Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Investigator and presented his credentials.

The period of inspection covered February 6, 2016, through February 6, 2017.

Business Profile:

Cochise Sports & Recreation, LLC is licensed as a Type 01, Dealer of Firearms Other Than Destructive Devices. The business conducts retail sales and transfers of firearms and accessories. Cochise Sports & Recreation, LLC is also a current Special Occupational Tax Payer.

Mr. Frank advised that the business sells handgun, rifle, and shotgun ammunition. Mr. Frank advised that the business does not manufacture ammunition. Mrs. Frank advised that the business does not conduct gunsmithing activities. The licensee does not wholesale firearms.

The business premises is the single family residence of Mr. and Mrs. Frank which is located in a rural area in Cochise County.

The licensee acquired (b)(4) firearms and disposed of (b)(4) firearms during the last 12 months. (b)(4) of the firearms sold or transferred by the

FIREARMS INSPECTION REPORT

Name: Cochise Sports & Recreation LLC
Trade Name: Cochise Sports & Recreation

UI#: 785090-2017-0107
FFL#: 9-86-003-01-7J-07645

licensee are new. (b)(4) percent of the business firearms are long guns and (b)(4) percent are handguns.

Mr. Frank advised the business uses (b)(4) as their primary suppliers.

The licensee does not participate in local gun shows.

The business does maintain a website, www.cochisesportsandrecreation.com. Firearms are for sale on the website utilizing Gallery of Guns. The licensee also conducts business through gunbroker.com and maintains a Facebook page.

Mr. Frank also conducts business as Realtor and in Medicare and Medicaid Insurance Sales from the same location.

IOI (b)(6) contacted (b)(6) Planning Technician for Cochise County, who advised that the licensee has a current home occupational permit issued by Cochise County.

The licensee has held this Federal Firearms License (FFL) for two years and six months and the current license will expire on September 1, 2017.

There is no off-site storage utilized.

Ownership and Control:

Cochise Sports & Recreation, LLC operates as a limited liability company in the State of Arizona. Richard V. Frank is listed and the sole manager of the LLC according to the Arizona Corporation Commission website. Mr. Richard Valentine Frank and Mrs. Brenda Grace Franks are the only RPs listed in the FLS database. Although Mrs. Frank is listed in the FLS database with the title of Member, information was not available from the Arizona Corporation Commission reflecting Mrs. Frank as being associated with the LLC. Mr. and Mrs. Frank were advised of the discrepancy with the Arizona Corporation Commission information.

There have been no changes to the business structure. No additional RPs were added because of this inspection. No hidden ownership was suspected.

Variance:

No variances are held by the licensee.

2 - Recommendation

FIREARMS INSPECTION REPORT

Name: Cochise Sports & Recreation LLC
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Violations Warning Letter Only and No Recall Inspection.

3 - Inspection History

Date of Inspection: July 31, 2014
Type of Inspection: Qualification Inspection
UI#: 785090-2014-0321
Inspection Results: Application approved. Acknowledgement of Federal Firearms Regulations was signed and dated on July 31, 2014.
Cited Violations: No Violations.

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

The business utilizes a hand written Acquisition & Disposition (A&D) Record book. A review of the licensee's A&D Record disclosed that the records are in the proper format, entries are not timely made, and all information is not recorded accurately as required.

A 100% physical inventory was conducted and five firearms were identified in the licensee's inventory. [REDACTED] firearms were recorded as acquisition in the A&D Record. The licensee's A&D Record books revealed seven open dispositions. A total comparison of the licensee's inventory to the A&D record was conducted revealing the following discrepancies: There were [REDACTED] open dispositions with no corresponding firearm in inventory. The licensee was able to reconcile the [REDACTED] open dispositions with an ATF Form 4473 for [REDACTED] firearm and a shipping invoice for [REDACTED] firearm that was disposed to another licensee. In addition, [REDACTED] acquisition entries were not correctly recorded and [REDACTED] disposition entries were not correctly recorded.

Due to these discrepancies the licensee was cited for violating 27 CFR 478.125 (e): Failure to record required acquisition and disposition information in an Acquisition and Disposition (A&D) Record in [REDACTED] instances. **Reference Worksheet 1 – Inventory & A&D Record, Exhibit 1 – Photos of A&D Record, and Report of Violations; ATF Form 5030.5.**

The licensee was instructed to immediately correct all acquisition and disposition errors in the A&D Record book. On February 8, 2017, IOI (b)(6) [REDACTED] verified that all corrections were made in the A&D Record book.

There were no Theft/Loss Reports submitted by the licensee during the inspection period or as a result of this inspection.

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IOI (b)(6) compared (b)(6) ATF Forms 4473 to the licensees A&D records and found that dispositions were recorded in a timely manner excluding the two aforementioned discrepancies.

There were no firearms with obliterated serial numbers or illegal firearms found during the inspection.

Standard operating procedures were discussed with the Mrs. Frank. When a firearm is received at the premises the firearm identification information is entered into the A&D Record and the firearm is placed in one of two safes in the residence. Mrs. Frank further stated that she will sometimes take information from the boxes firearms are received in to enter into the A&D Record but always takes the serial number from the firearm itself. Mrs. Frank is the only one to make A&D Record entries. Personal firearms are separated from business firearms.

5 - ATF Forms 4473 – NICS & Other Dispositions

IOI (b)(6) review (b)(6) ATF Forms 4473 completed during the inspection period. The licensee retains ATF Forms 4473 in chronological order. A review of the licensee's records and forms disclosed that transfers to non-licensees were not properly documented and executed. A further review revealed the following violations:

Failure to complete and retain an ATF Form 4473 in (b)(3) - 112 P02 instances. The licensee was cited for violating 27 CFR 478.124(a). **Reference Worksheet 2 – 4473 (2012 Edition) and Report of Violations, ATF Form 5030.5.**

Failure to conduct a NICS check prior to the transfer of a firearm in (b)(3) - 112 P02 instances. The licensee was cited for violating 27 CFR 478.102(a). **Reference Worksheet 2 – 4473 (2012 Edition) and Report of Violations, ATF Form 5030.5.** A criminal history query of Mr. Frank was conducted with no prohibiting information returned.

Mr. Frank stated that for both of the above referenced violations that he had previously been a sole proprietorship before changing the Federal Firearms License to the LLC and was not aware of the requirement to complete an ATF Form 4473 when transferring a firearm to himself. Further, Mr. Frank provided a letter detailing how the errors occurred. **Reference Exhibit 2 – Letter From Mr. Frank.**

The FFL audit log verification was conducted on two National Instant Criminal Background Check (NICS) numbers with no discrepancies.

Standard operating procedures were discussed with Mrs. Frank who stated that after the ATF Form 4473 is completed and the firearm is transferred, she records the disposition in the A&D Record and then files the form in chronological order. Mr. Frank further

FIREARMS INSPECTION REPORT

Name: Cochise Sports & Recreation LLC
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advised that he is the primary one to conduct transfers of firearms and complete the licensee sections of the ATF Form 4473.

The licensee did not have any transfers to law enforcement officers during the inspection period. The licensee properly documents all transfers to and from other licensees and the licensee utilizes FFL EZ Check.

6 - Multiple Sales

According to the Violent Crime Analysis Branch (VCAB), there was [REDACTED] multiple sale of pistols or revolvers involving [REDACTED] firearms reported during the inspection period. No unreported multiple sales were identified during the inspection.

7 - Suspicious/Prohibited Purchasers

No suspected traffickers, straw purchasers, prohibited persons, or any other suspicious purchasers were revealed during this inspection.

8 - Trace Activity

The licensee was not subject to any trace request during the last 12 months.

Secondary Market Analysis was not conducted as the licensee did not transfer any used firearms to non-licensee in the last 12 months and the licensee did not have any used firearms in inventory.

9 - NFA/Importer/Collector/Manufacturer

The licensee does not conduct business as an Importer, or Collector, and/or Manufacturer of Firearms.

The licensee has a valid Special Occupational Tax (SOT) for Tax Years 2016 and 2017 and conducts sales and manufacturing of NFA items.

According to the National Firearm Registration and Transfer Record (NFRTR), the licensee had [REDACTED] NFA firearms registered. The NFRTR was compared to the physical inventory with no discrepancies found. IOI [REDACTED] compared the approved ATF Forms 3 to the licensee's inventory and the NFRTR with no discrepancies noted.

10 - Referrals

No Referrals were generated as a result of this inspection.

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11 - Other

The licensee had the Youth Handgun Safety Act Poster displayed and had pamphlets available.

The licensee maintains firearm safety devices to have available to customers and for firearms that do not have a safety device. The licensee does not have secure gun storage items for purchase.

IOI (b)(6) queried responsible persons Richard Valentine Frank and Brenda Grace Frank in Open Fox, Arizona Judicial Branch, and Accurint resulting in zero prohibiting information. Two criminal history checks were performed during the inspection on Mr. and Mrs. Frank with no prohibiting information returned.

Deconfliction was conducted by Intelligence Research Specialist (b)(6) through NForce and LEIA with negative results.

12 - Closing Actions

On February 8, 2017, IOI (b)(6) held a closing conference with Mr. Richard Frank Managing-Member/RP and Mrs. Brenda Frank Member/RP. IOI (b)(6) reviewed the Acknowledgement of Federal Firearms Regulations with the licensee. Mr. Frank signed the acknowledgement stating that the regulations covered were understood and that any questions were discussed, a copy was provided to the licensee. **Reference Exhibit 3 – Acknowledgement of Federal Firearms Regulations.**

The licensee was provided with the following reference materials:

- Loss Prevention for Firearms Retailer (ATF P 5380.1).
- Instructions on how to bookmark or download and save the Federal Firearms Regulations Reference Guide (ATF P 5300.4).
- ATF Ruling 2016-1: Requirements to Keep Firearms Records Electronically.
- Firearms Transaction Record Part I – Over-the-Counter (ATF F 4473).

The licensee was also provided with contact information for the local ATF Field Office and instructed to contact the office with any questions they may have in the future.

On February 8, 2017, the **Report of Violations (ROV), ATF Form 5030.5**, was reviewed with the licensee. Each violation and the corresponding corrective action was discussed in detail. The licensee indicated that he understood the violations by signing and dating the ROV. The licensee was provided a copy of the ROV. A copy of the ROV is maintained in the area office file.

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Name: Cochise Sports & Recreation LLC
Trade Name: Cochise Sports & Recreation

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On February 21, 2017, an **Amended Report of Violations (ROV), ATF Form 5030.5**, was reviewed with the licensee and sent via email to the licensee. Each violation and the corresponding corrective action was discussed in detail. The licensee indicated that he understood the violations by signing and dating the Amended ROV on February 23, 2017, and providing IOI (b)(6) the signed copy via email. The licensee was provided a copy of the Amended ROV. A copy of the Amended ROV is maintained in the area office file.

13 - Violations

1. 27 CFR 478.125(e)

Nature of Violation: Failure to record required acquisition and disposition information in an Acquisition and Disposition (A&D) Record in (b)(6) instances. Specifically, failure to accurately or correctly record six acquisitions in the A&D Record. Failure to accurately or correctly record (b)(6) dispositions in the A&D Record. Failure to record (b)(6) dispositions of a firearms in the A&D Record.

Licensee's Response: Mr. Frank stated that errors regarding the incorrect acquisition and disposition information, specifically the entries where the firearm was acquired from or disposed to him, that he felt misinformed on how to dispose of a firearm to himself now that the license is associated with an LLC. In reference to the A&D entries where the disposition information was not recorded, Mrs. Frank stated that she forgot to do it. Further, Mrs. Frank stated that she had taken the model information off the box for some firearms which caused the additional acquisition errors.

Corrective Action: The licensee was instructed to correct the information for the acquisition and (b)(6) disposition entries in the A&D Record. The licensee was instructed to record the disposition of (b)(6) firearms in the A&D Record.

The licensee was also advised that all information pertaining to the firearm when recorded into the Acquisition portion of the A&D Record must be obtained from the firearm itself, not from the invoice and/or box in which the firearm was packaged.

Reference Worksheet 1 – Inventory & A&D Record Book, Exhibit 1 – A&D Record Book, and Report of Violations; ATF Form 5030.5.

2. 27 CFR 478.124(a)

Nature of Violation: Failure to complete and retain an ATF Form 4473 in (b)(6) instances. Specifically, failure to complete an ATF Form 4473 during the transfer of a firearm to a Federal Firearms Licensee (FFL) Responsible Person in (b)(6) instance.

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Licensee's Response: Mr. Frank stated that they just didn't know that an ATF Form 4473 had to be completed. Further, Mr. Frank stated that they were blindsided by the error as the licensee had not been inspected since becoming licensed under the LLC.

Corrective Action: The licensee was advised that when transferring a firearm to an FFL Responsible Person the Responsible Person must complete an ATF Form 4473 prior to the transfer of a firearm.

Reference Worksheet 2 – 4473 (2012 edition), Report of Violations; ATF Form 5030.5, and Exhibit 2 – Letter From Mr. Frank.

3. **27 CFR 478.102(a)**

Nature of Violation: Failure to conduct a NICS check prior to the transfer of a firearm in (b)(3) - 112 P.01 instances. Specifically, failure to conduct a NICS check on a Federal Firearms Licensee (FFL) Responsible Person in (b)(3) - 112 P.01 instances.

Licensee's Response: Mr. Frank stated that they just didn't know that an ATF Form 4473 had to be completed. Mr. Frank further stated that he would have recorded his Arizona Concealed Weapons Permit as an exemption to NICS.

Corrective Action: The licensee was advised that when transferring a firearm to an FFL Responsible Person the Responsible Person must complete an ATF Form 4473 and the licensee must conduct a NICS check, or record a valid state permit which qualifies as a NICS exemption, prior to the transfer of a firearm.

Reference Worksheet 2 – 4473 (2012 edition), Report of Violations; ATF Form 5030.5, and Exhibit 2 – Letter From Mr. Frank.

X

Industry Operations Investigator

Index of Worksheets and Exhibits

Worksheets:

- Informational Page
- Worksheet 1 – Inventory, A&D.
- Worksheet 2 – 4473 (2012 edition)

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Trade Name: Cochise Sports & Recreation

UI#: 785090-2017-0107
FFL#: 9-86-003-01-7J-07645

- Worksheet 2 – 4473 (2016 edition)
- Other Statistics

Exhibits:

- Exhibit 1 – Photos of A&D Record.
- Exhibit 2 – Letter From Mr. Frank.
- Exhibit 3 – Acknowledgement of Federal Firearms Regulations.