

## Assignment and Report

<b>1. OPERATING NAME AND ADDRESS</b> (INCLUDE ZIP CODE AND COUNTY)  Arkansas Trading & Loan, Inc. 918 E. 4th St. Russellville, AR 72801, Pope		<b>2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.)</b> 777060-2017-0117-B1B																																																		
		<b>3. PERMIT/LICENSE NUMBER</b> 571115020C36651	<b>4a. TARGET DATE</b> 8/31/2017	<b>4b. TARGET HOURS</b> 40																																																
		<b>5. REQUESTED BY (SIGNATURE, TITLE AND DATE)</b>																																																		
<b>6. ATF OFFICER(S) ASSIGNED</b> (b) (6) - Lead Investigator																																																				
<b>7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)</b> (b) (6), Area Supervisor, 10/03/2016																																																				
<b>8. PURPOSE/SPECIAL INSTRUCTIONS</b> Conduct a full DE compliance inspection of this licensee. Obtain EIN.																																																				
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## Assignment and Report

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	3. PERMIT/LICENSE NUMBER 571115020C36651	4a. TARGET DATE 8/31/2017	4b. TARGET HOURS 40
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

ROUTING SEQUENCE AND DATE

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

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

# 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 Arkansas Trading & Loan, Inc.	Street Address 918 E. 4th St.	City Russellville	State AR	Zip Code 72801-	County Pope	Page 1 of 3 Pages
License/Permit/Registry Number (If any) 571115027C36651		Expiration Date 3/1/2020		Date(s) or Period of Inspection 01/31/2016 through 01/31/2017		

## 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 firearm acquisitions and dispositions as prescribed by <sup>regulation</sup> violations.

Failure on <sup>(b) (3) - Public Law</sup> occasions to record correct acquisition information. <sup>(b) (3) - Public</sup> instances, a firearm manufacturer was incorrectly recorded; <sup>(b) (3) - Public</sup> instance a firearm serial number was incorrectly recorded.

Failure on two (2) occasions to record the disposition of a firearm to another FFL <sup>timely</sup>.

Citation: 27 CFR 478.125(c)

### Date Corrections to be Made:

(If not corrected immediately)

### Corrective Action to be Taken:

(If not corrected immediately)

Inaccurate acquisition information was corrected by Josh Panther as it was identified during the inspection

Unrecorded dispositions were verified using shipping documents. Dispositions were recorded in the A&D record by Josh Panther as they were discovered.

Number: 2

### Nature of Violation:

Failure to complete the ATF Form 4473 as prescribed by <sup>regulation</sup> violations. On <sup>(b) (3) - Public Law</sup> form, the licensee failed to complete the 4473 with the licensee name and address; <sup>(b) (3) - Public Law</sup> form, the licensee failed to complete the 4473 with the licensee name and address and failed to require a recertification signature and date following a delayed response from NICS; or <sup>(b) (3) - Public Law</sup> form the licensee failed to require the transferee to recertify the form following a delayed response from NICS.

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 shall complete the ATF Form 4473 as prescribed by regulations.

## Report of Violations

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License/Permit/Registry Number (If any) 571115027C36651	Expiration Date 3/1/2020	Date(s) or Period of Inspection 01/31/2016 through 01/31/2017				

### 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 complete the ATF Form 4473 as prescribed by regulations. On 20 forms the transferee did not record a full middle name; On (b) (3) - Public Law forms, an accurate county was not recorded; On (b) (3) - Public Law forms, the transferee did not record a full city and state of birth; On (b) (3) - Public Law form, the transferee did not answer section 11(h); on (b) (3) - Public Law form, the transferee did not record a correct state abbreviation and did not list an Arkansas county; on (b) (3) - Public Law form the transferee did not record a certification date.

Citation: 27 CFR 478.124(c)(1)

Number: 4

#### Nature of Violation:

Failure to complete the ATF Form 4473 as prescribed by regulations. On (b) (3) - Public Law form, the licensee failed to record the final NICS disposition.

Citation: 27 CFR 478.124(c)(3)(iv)

#### Date Corrections to be Made:

(If not corrected immediately)

**Corrective Action to be Taken:** The licensee shall require the proper completion of the ATF Form 4473 prior to the transfer of a firearm.

(If not corrected immediately)

#### Date Corrections to be Made:

(If not corrected immediately)

**Corrective Action to be Taken:** The licensee shall ensure the proper completion of the ATF Form 4473.

(If not corrected immediately)



## 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.

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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: 5

#### Nature of Violation:

Failure to complete and submit the ATF 3310.4 Report of Multiple Handgun Sales, following the disposition of two or more firearms to a non-licensee within 5 business days.

Citation: 27 CFR 478.126a

#### Date Corrections to be Made:

(If not corrected immediately)

#### Corrective Action to be Taken:

(If not corrected immediately)

(b) (6) completed and submitted reports as they were discovered during the inspection process.

Number: 6

#### Nature of Violation:

Failure to complete the ATF Form 4473 as prescribed by regulations. On the form, the final transfer date was erroneously recorded. The date recorded on the form was prior to the transferee's recertification date.

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 shall complete the ATF Form 4473 as prescribed by regulations.

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

Signature and Title of ATF

(b) (6)

Owner  
L. O. L.

Date  
2-8-2017  
Date  
2/8/2017



U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives  
425 West Capitol Avenue, Suite 775  
Little Rock, Arkansas 72201

[www.atf.gov](http://www.atf.gov)

April 18, 2017

777060 (b) (6)  
5300

CERTIFIED MAIL

Mrs. Wendy Panther  
Vice President  
Arkansas Trading & Loan, Inc.  
918 East 4<sup>th</sup> Street  
Russellville, Arkansas 72801

*Federal Firearms License 5-71-115-02-0C-36651*

Dear Mrs. Panther:

During a recent compliance inspection at your firearms business covering the period of January 31, 2016, until January 31, 2017, you were cited for violations of 27 Code of Federal Regulations, Part 478. A copy of the Report of Violations, Form 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) investigator. You indicated that you understood the requirements of the firearms laws and regulations. You further indicated that corrective actions would be taken to eliminate future violations.

The records you are required to maintain and the business operations you conduct are important to law enforcement in our continuing effort 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 ensure that criminals do not gain access to firearms. ATF appreciates the efforts you and other industry members make in this area, and we look forward to continuing to work with you in that regard.

You are reminded that retention of your Federal Firearms License is 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.

Arkansas Trading & Loan, Inc.

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

Sincerely yours,

(b) (6)

Area Supervisor

Enclosure

cc: Federal Firearms Licensing Center  
Little Rock II Field Office



# FIREARMS INSPECTION REPORT

**Name:** Arkansas Trading & Loan, Inc.  
**Trade Name:**

**UI#:** 777060-2017-0117-B1B  
**FFL#:** 5-71-115-02-7C-36651

**Address:** 918 East 4<sup>th</sup> Street  
Russellville, AR 72801                      Pope County

## 1 - Introduction

### Inspection Profile:

Investigator (b)(6) conducted a Full Compliance Inspection at the licensed premises of Arkansas Trading & Loan, Inc. on January 31, 2017-February 8, 2017. Corporation Vice President Wendy Panther and sales clerk Josh Panther assisted with the inspection. Josh Panther is Wendy Panther's son. The inspection period was January 31, 2016-January 31, 2017. The investigator did not give advanced notification of the compliance inspection.

### Business Profile:

Arkansas Trading & Loan, Inc. has held a Type-02 *Pawnbroker in Firearms* FFL since 1999. Corporate officers Kenneth Panther and another individual operated the business as a partnership from 1990-1999. The business is located on the outskirts of Russellville, Arkansas on a moderately traveled side street. In addition to firearms, the pawnshop offers firearm accessories, ammunition, hunting supplies, household items, movies, tools, and jewelry for sale. The Panthers operate Panther Archery on the same business premises. No off-site storage of firearms occurred during the inspection period.

The entity acquired (b)(4) firearms (b)(4) handguns (b)(4) receivers, and (b)(4) long guns) during the inspection period. Approximately (b)(4) firearms (b)(4) handguns, (b)(4) receivers, and (b)(4) long guns) were transferred within that same time period. New firearms are acquired from (b)(4) (b)(4)

New firearms make up approximately (b)(4) of the licensee's firearm inventory. All firearm transfers are retail sales, pawn transactions, layaways, or internet transfers; no wholesale transfers occur. No transfers are made at qualifying events.

### Ownership and Control:

According to the Arkansas Secretary of State, Arkansas Trading & Loan, Inc., is in "Good Standing" and has only two officers (**See Exhibit 1**). Kenneth Panther and Wendy Panther are shown as officers of the corporation, and both are correctly shown within the Federal Licensing System as a Responsible Person for the Type-02 Pawnbroker's license. Hidden ownership is not suspected. Each officer holds 50% of the ownership in the corporation.



# FIREARMS INSPECTION REPORT

**Name:** Arkansas Trading & Loan, Inc.  
**Trade Name:**

**UI#:** 777060-2017-0117-B1B  
**FFL#:** 5-71-115-02-7C-36651

## Variance:

The licensee holds no variances.

## **2 - Recommendation**

Violations; ROV and Warning Letter; No Recall Inspection

## **3 - Inspection History**

The subject compliance inspection was the second inspection conducted with the licensee since original licensing in 1999.

**Date of Inspection:** July 28, 2006  
**Type of Inspection:** Compliance Inspection  
**UI#:** 777060-2006-0179  
**Inspection Results:** Violations; ROV Only; No Recall Inspection  
**Cited Violations:**

- 27 CFR 478.124(c)(1) (b)(3) Instances
- 27 CFR 478.124(c)(3)(iv) (b)(3) Instances
- 27 CFR 478.21(a) (b)(3) Instances

**Date of Inspection:** January 27, 1999  
**Type of Inspection:** Qualification Inspection  
**UI#:** 73308-99-0079  
**Inspection Results:** Application approved.  
**Cited Violations:** None

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

There were 546 firearms in physical inventory at the time of the compliance inspection. All were either in pawn, in layaway, or available for retail sale. The official computerized acquisition & disposition (A&D) record contained (b)(3) - 112 open firearm entries. Firearms in physical inventory were compared to the firearms recorded in the A&D record which disclosed the following discrepancies (See **Exhibit 2, Violation 1, and Worksheet 1**):

- (b)(3) - 112 FIREARMS firearm serial number was entered incorrectly at acquisition and (b)(3) - 112 FIREARMS firearm manufacturers were entered incorrectly at acquisition.
- (b)(3) - 112 FIREARMS firearm dispositions to another licensee were not recorded.

The dispositions were verified using FFL transfer records. Josh Panther commented that these instances involved firearms that were sent back to the manufacturer due to malfunction. He stated that he did not know an official disposition had to occur in these instances. Mr. Panther corrected the deficiencies as they were discovered.

# FIREARMS INSPECTION REPORT

**Name:** Arkansas Trading & Loan, Inc.  
**Trade Name:**

**UI#:** 777060-2017-0117-B1B  
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Fifty (50) firearms were queried through the licensee's A&D record from acquisition through disposition without issue. No illegal firearms or firearms with obliterated serial numbers were discovered within the licensee's physical inventory.

The licensee conducts annual inventories by comparing the A&D records to the firearms in inventory.

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

(b)(3) - 112 P (b)(3) - 112 P ATF Forms 4473 were on file for the inspection period. The investigator reviewed all (b)(3) - 112 P forms for accuracy and completion. The following violations were disclosed during the review (**See Exhibit 3, Violations 2, 3, 4, and 6, and Worksheet 2**):

- 27 CFR 478.21(a) – (b)(3) - 112 P (b)(3) - 112 P Instances (**Violation 2**)
- 27 CFR 478.124(c)(1) – (b)(3) - 112 P Instances (**Violation 3**)
- 27 CFR 478.124(c)(3)(iv) – (b)(3) - 112 P Instance (**Violation 4**)
- 27 CFR 478.124(c)(5) – (b)(3) - 112 P Instance (**Violation 6**)

The investigator verified 116 NICS Transaction Numbers using the FFL Audit Log. Josh Panther reviews the transaction forms before filing.

## 6 - Multiple Sales

(b)(3) - 112 P (b)(3) - 112 P multiple sales involving (b)(3) - 112 P firearms were properly reported to the National Tracing Center. The review of the licensee's records disclosed (b)(3) - 112 P (b)(3) - 112 P unreported multiple sale transactions involving (b)(3) - 112 P firearms during the inspection period (**See Exhibit 4, Violation 5, and Worksheet 2**).

Josh Panther completed and submitted an ATF Form 3310.4 for each transaction as the omissions were discovered.

## 7 - Suspicious/Prohibited Purchasers

(b)(3) - 112 P (b)(3) - 112 P The investigator queried (b)(3) - 112 P multiple purchasers and one (1) possible prohibited purchaser through the OpenFox criminal history database. No positive hits were received.

## 8 - Trace Activity

(b)(3) - 112 P (b)(3) - 112 P trace requests were made to the licensee during the inspection period. All requests were successfully completed. No unsuccessful trace requests occurred. All secondary market firearms in inventory were queried through OpenFox. No stolen firearm hits were received.

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## 9 - NFA/Importer/Collector/Manufacturer

The licensee does not facilitate NFA weapons transfers. No firearm importation, exportation, or manufacturing occurs. The licensee is aware of the process involved when completing transactions with licensed firearms collectors.

## 10 - Referrals

No referrals were generated.

## 11 - Other

There were no other findings. The Youth Handgun Act Poster is displayed in view of customers as required and the accompanying pamphlets are provided as prescribed by regulations.

## 12 - Closing Actions

Investigator (b)(6) conducted a closing conference with Vice President Wendy Panther and store clerk (b)(6) on February 8, 2017. The investigator reviewed the violations thoroughly with the individuals. Mrs. Panther signed the Report of Violations (ROV) and was provided with a copy for her records. The Acknowledgement of Federal Firearms Regulations was reviewed with Wendy and (b)(6) Panther on February 8, 2017. Mrs. Panther certified the document with her initials during the review and signed the Acknowledgement at the conclusion of the review (See Exhibit 5). No reference materials were requested by or provided to the licensee.

## 13 - Violations

### 1. 27 CFR 478.125(e)

**Nature of Violation:** Failure to record firearm acquisitions and dispositions as prescribed by violations. Failure on (b)(3) - 112 Public L occasions to record correct acquisition information. In (b)(3) - 112 Public L instances, a firearm manufacturer was incorrectly recorded; in (b)(3) - 112 Public L instance, a firearm serial number was incorrectly recorded. Failure on (b)(3) - 112 Public L occasions to record the disposition of a firearm to another FFL.

**Licensee's Response:** I tried to get things right.

**Corrective Action:** Josh Panther corrected the incorrectly recorded serial numbers and manufacturers. The dispositions to other FFLs were verified using shipping documents, and recorded in the licensee's computerized records



## FIREARMS INSPECTION REPORT

**Name:** Arkansas Trading & Loan, Inc.  
**Trade Name:**

**UI#:** 777060-2017-0117-B1B  
**FFL#:** 5-71-115-02-7C-36651

### REFERENCES: Worksheet 1 and Exhibit 2

#### 2. 27 CFR 478.21(a) REPEAT OF VIOLATION CITED IN 2006 INSPECTION

**Nature of Violation:** Failure to complete the ATF Form 4473 properly. On [REDACTED] form the licensee failed to complete the 4473 with the licensee name and address; on [REDACTED] form the licensee failed to complete the 4473 with the licensee name and address and failed to require a recertification signature and date following a delayed response from NICS; on [REDACTED] form the licensee failed to require the transferee to recertify the form following a delayed response from NICS.

**Licensee's Response:** We need to get better at reviewing the forms.

**Corrective Action:** The licensee shall complete the ATF Form 4473 as prescribed by regulations.

### REFERENCES: Worksheet 2 and Exhibit 3

#### 3. 27 CFR 478.124(c)(1) REPEAT OF VIOLATION CITED IN 2006 INSPECTION

**Nature of Violation:** Failure to complete the ATF Form 4473 as prescribed by regulations. On [REDACTED] forms the transferee did not record a full middle name; [REDACTED] forms an accurate county was not recorded; on [REDACTED] forms the transferee did not record a full city and state of birth; on [REDACTED] form the transferee did not answer section 11(h); on [REDACTED] form the transferee did not record a correct state abbreviation and did not list an Arkansas county; on [REDACTED] form the transferee did not record a certification date.

**Licensee's Response:** We need to do better with our review.

**Corrective Action:** The licensee shall require the proper completion of the ATF Form 4473 prior to the transfer of a firearm.

### REFERENCES: Worksheet 2; Exhibit 3

#### 4. 27 CFR 478.124(c)(3)(iv) REPEAT OF VIOLATION CITED IN 2006 INSPECTION

**Nature of Violation:** Failure to complete the ATF Form 4473 as prescribed by regulations. On [REDACTED] form the licensee failed to record the final NICS disposition.

**Licensee's Response:** We just missed that one.

**Corrective Action:** The licensee shall ensure the proper completion of the ATF Form 4473.

## FIREARMS INSPECTION REPORT

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### REFERENCES: Worksheet 2; Exhibit 3

5. **27 CFR 478.126(a)**

**Nature of Violation:** Failure on (b)(3) - 112 Public Law 55 occasions to complete and submit the ATF 3310.4 Report of Multiple Handgun Sales, following the disposition of two or more firearms to a non-licensee within 5 business days.

**Licensee's Response:** I don't know how we missed all these.

**Corrective Action:** Josh Panther completed and submitted (b)(3) - 112 Public Law 5 reports as they were discovered during the inspection process.

### REFERENCES: Worksheet 2; Exhibit 3

6. **27 CFR 478.124(c)(5)**

**Nature of Violation:** Failure to complete the ATF Form 4473 as prescribed by regulations. On (b)(3) - 112 Public L Form the final transfer date was erroneously recorded. The date recorded on the form was prior to the transferee's recertification date.

**Licensee's Response:** I guess we were just busy that day.

**Corrective Action:** The licensee shall complete the ATF Form 4473 as prescribed by regulations.

### REFERENCES: Worksheet 2; Exhibit 3

**X**

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Industry Operations Investigator

# **FIREARMS INSPECTION REPORT**

**Name:** Arkansas Trading & Loan, Inc.  
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## **Index of Worksheets and Exhibits**

Worksheet 1-Inventory and A&D Review  
Worksheet 2-ATF Form 4473 Review

Exhibit 1-Secretary of State Registration  
Exhibit 2-Inventory Discrepancies  
Exhibit 3-Form 4473 Discrepancies  
Exhibit 4-Unreported Multiple Sales  
Exhibit 5-Acknowledgement of Federal Firearms Regulations